



K-IRPC *Kankakee-Iroquois Regional Planning Commission*

115 East Fourth Street, P.O. Box 127, Monon, Indiana 47959-0127

January 20, 2014

- * *Economic/Community Development*
- * *Arrowhead Country Public Transit*
- * *K-IRPC Head Start Program*
- * *Rural Transportation Planning*

Mr. Don West
Environmental Management Support, Inc.
8601 Georgia Avenue, Suite 500
Silver Spring, MD 20910

Re: FY2014 Brownfields Grant Proposal
\$400,000 U.S. EPA Brownfields Hazardous Substances Assessment Grant
\$200,000 Petroleum Assessment Grant
KIRPC, Indiana

Dear Mr. West:

The Kankakee-Iroquois Regional Planning Commission (KIRPC), the City of Delphi and the City of Knox have formed a coalition (the Coalition) to apply for a U.S. EPA Assessment Grant. KIRPC, who will serve as the lead agency and act as the grant recipient/administrator, is submitting the enclosed application for an Assessment Grant on behalf of the Coalition. The Coalition is requesting a \$400,000 Community Wide Hazardous Substance Assessment Grant and \$200,000 Community Wide Petroleum Assessment Grant.

KIRPC represents the eight counties of Benton, Carroll, Jasper, Newton, Pulaski, Starke, Warren, and White, located in northwest Indiana. KIRPC formed this coalition with the City of Delphi (Carroll County) and City of Knox (Starke County) after these cities and other smaller towns voiced concerns with significant health, welfare and environmental impact brownfields were creating and due to the inability of small communities to deal with these issues. The KIRPC coalition covers eight rural counties approximately 3,300 square miles in size. KIRPC, and therefore the Coalition, consists of 8 counties and 38 micro communities. The largest city in the Coalition has a population under 5,900 and two counties in the Coalition qualify as a micro community with a total county population of fewer than 10,000 people. While the Coalition is rural, cumulatively the problems created by the KIRPC brownfields rival that of a large city. Historically, farming communities have been more tolerant to swings in the economy; however, the latest downturn in the economy has decimated the region with the supporting cities and towns hardest hit. As one major employer after another closed, jobs were lost and a systemic downward spiral ensued. The Coalition area is mired in an economic crisis, with families struggling to meet fundamental needs. None of the Coalition communities have the resources to manage a successful brownfield program individually but as an established region working together, we can pool our resources and expertise and begin to address the challenges, threats and opportunities brownfields represent for us. Drawing on our renewable energy experience (home to the largest single concentrated wind farm in the U.S.), a regional goal is to make the KIRPC region the leading renewable energy research, development and manufacturing area in the U.S.

The Coalition has identified more than 690 potential brownfields (gasoline/service stations, bulk petroleum plants, machine shops, metal scrap yards, and manufacturing plants) of known or suspected environmental contamination (hazardous substances and petroleum products), most of which are located in or around the Coalition communities and near one of the four KIRPC river ecosystems. These sites are predominantly located in low-income neighborhoods, adjacent to river ecosystems, or represent direct threats to drinking water sources. Residents are being exposed to brownfield contaminants via direct contact, ingestion, and inhalation due to airborne particulates and vapor intrusion. The Coalition's overriding health and welfare concern is the concentration of brownfields in low-income areas and the impacts the brownfields are creating on the sensitive populations and ecosystems. In addition the rural agricultural based of the counties are dependent on a reliable and safe water supply. The citizens of KIRPC micro communities are hurting; some of our target communities have per capita incomes of less than half the U.S. rates and

A VOLUNTARY PUBLIC PARTNERSHIP SERVING

BENTON - CARROLL - JASPER - NEWTON - PULASKI - STARKE - WARREN - WHITE COUNTIES, INDIANA

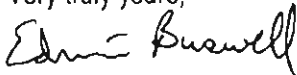
poverty rates that are nearly 2.5 times the national average. While this data paints a sad picture of a region in decline, the neighborhoods and micro communities around the Coalition brownfields provide a textbook example of environmental injustice with residents fairing far worse than the overall KIRPC region.

With Assessment Grant funds, they can support the redevelopment of brownfields, and provide new and sustainable employment opportunities to the citizens being most impacted by these sites with KIRPC providing assistance to communities that simply cannot support a brownfield program on their own.

The following applicant information is provided as part of the Grant Application:

- a. Applicant Identification: Kankakee Iroquois Regional Planning Commission
PO Box 127
Monon, Indiana, 47959
- b. Dun and Bradstreet (DUNS): 171384444
- c. Funding Requested:
 - (i) Grant type: Assessment
 - (ii) Federal Funds Requested: \$600,000
 - (iii) Contamination: \$400,000 Hazardous Substances and \$200,000 Petroleum
 - (iv) Coalition
- d. Location: Kankakee Iroquois Regional Planning Commission representing Benton, Carroll, Jasper, Newton, Pulaski, Starke, Warren and White Counties and coalition partners City of Knox and City of Delphi, Indiana
- e. NA- Not a site-specific proposal
- f. Contacts:
 - (i) **Project Director**: Mr. Edwin Buswell, AICP
Kankakee Iroquois Regional Planning Commission
PO Box 127
Monon, Indiana, 47959
Phone: (219) 253-6658, email: elb@urhere.net
 - (ii) **Chief Executive**: Mr. Edwin Buswell, AICP
Kankakee Iroquois Regional Planning Commission
PO Box 127
Monon, Indiana, 47959
Phone: (219) 253-6658, email: elb@urhere.net
- g. Date Submitted: January 20, 2014
- h. Project Period: Three years
- i. Population: (i) KIRPC region: 146,647; Delphi: 2,893; Knox: 3,704
(ii) total population in Coalition area: 49,462 (U.S. Census Bureau 2010)
- j. Special Considerations Checklist: Attached

Very truly yours,



Edwin Buswell, AICP
KIRPC Coalition, Indiana

**FY 2014 UNITED STATES ENVIRONMENTAL PROTECTION AGENCY (EPA) BROWNFIELDS
HAZARDOUS SUBSTANCES AND PETROLEUM ASSESSMENT GRANT APPLICATION
SUBMITTED BY KANKAKEE IROQUOIS REGIONAL PLANNING COMMISSION, CITIES OF DELPHI
AND KNOX, INDIANA**

RANKING CRITERIA FOR ASSESSMENT GRANTS

1. Community Need:

This EPA Brownfields Coalition Community-wide Assessment Grant Proposal is to address hazardous substances and petroleum contamination at brownfields with redevelopment potential within the jurisdictions covered by the **Kankakee-Iroquois Regional Planning Commission (KIRPC)**, representing eight Indiana counties: Benton, Carroll, Jasper, Newton, Pulaski, Starke, Warren, and White. KIRPC formed this coalition with the City of Delphi (Carroll County) and City of Knox (Starke County) after these cities and a host of smaller towns voiced concerns with significant health, welfare and environmental impacts from brownfields and with the inability of these micro communities, having populations of less than 10,000, to address brownfields with these issues. Located in Northwest Indiana, the KIRPC coalition (Coalition) covers eight rural counties approximately 3,300 square miles in size and is comprised of 38 micro communities. The largest city in the Coalition has a population under 5,900 and two counties in the Coalition qualify as a micro community with a total county population of fewer than 10,000 people. KIRPC was home to Indiana's first windfarm, the largest single concentrated windfarm in the U.S. While the Coalition is predominantly rural and populated with micro communities, the cumulative problems created by the Coalition's brownfields rival those of a large city. Historically, farming communities have been more tolerant to swings in the economy; however, the latest downturn in the economy has decimated the region with the micro communities being hardest hit. As one major employer after another shuttered manufacturing plants, jobs were lost and a systemic downward spiral ensued. In instances when work can be found, the Coalition's residents are forced to travel farther distances and, in many instances, travel outside their communities to shop and meet their basic needs, placing a further burden on the residents. The Coalition area is mired in an economic crisis, with families struggling to meet fundamental needs. Not one of the eight counties (or individual cities/towns) have the resources to manage a successful brownfields program individually but as an established region working together, we can pool our resources and expertise and begin to address the challenges, threats and opportunities brownfields represent for our region. Drawing on our renewable energy experience, a regional goal is to make the Coalition area one of the leading renewable energy research, development and manufacturing regions in the U.S.

a. Targeted Community and Brownfields:

(i) The Coalition communities were developed at a time when industrial facilities were the focal point of communities. Over 100 years of industrial operations created numerous brownfields and had a cumulative impact to the health and welfare of the Coalition's residents. With this grant, the Coalition can determine the extent of brownfields contamination, control contaminant migration, and protect and improve health and welfare of the citizens. The Coalition desperately needs to develop its brownfields program, and an Assessment Grant will provide the funds to begin to tackle these issues and establish a formal brownfields redevelopment approach. The Coalition identified five target communities that have significant numbers of large brownfields or have immediate health and human threats that are located in low-income towns or neighborhoods, creating environmental injustice. The targeted communities are (1) **Canal District**, located in the City of Delphi, it contains a former paper mill, former Globe Valve factory and the recently shuttered Peters-Revington furniture factory; (2) **Kentland** located in Newton County and home to the vacant Bonnell Aluminum Plant; (3) **West Knox** is home to the former Rockwell Window and adjoining Nor-am Plastics plants in the City of Knox; (4) **Winamac Rail Corridor**, in the town of Winamac, Pulaski County, contains 10 sites known as the Railroad Corridor Redevelopment Initiative (RCRI) along former railroad grade through center of town; and (5) **Boswell Old 41 Corridor** (Boswell) is comprised of 12 sites including an abandoned fertilizer plant, junk yards, and abandoned gas stations.

(ii) Demographic data for the Coalition area and targeted communities are presented below:

	National	Indiana	KIRPC Counties	Delphi (City)⁴	Knox (City)⁴
Population ¹	308,745,538	6,483,802	146,647	2,893	3,704
Children ¹	27.0%	27.9%	27.2%	28.4%	29.5%
Seniors ¹	13.0%	13.0%	15.8%	18.0%	13.5%
Women, Child-bearing age ¹	23.9%	23.5%	21.2%	23.0%	24.7%



Unemployment ²	7.2%	8.1%	7.3%	14.1%	9.9%
Minority % ¹	27.6%	15.7%	4.3%	8.3%	3.7%
Hispanic % ¹	16.3%	6.0%	4.5%	11.3%	2.9%
Poverty Rate ³	15.1%	15.6%	17.9%	21.4%	24.3%
<50%Poverty Rate ³	6.5%	8.5%	6.7%	11.7%	10.3%
Median Household Income ³	\$49,445	\$47,185	\$37,282	\$42,328	\$28,659
Per Capita Income ³	\$27,319	\$24,048	\$18,368	\$17,696	\$16,775

	Winamac Rail⁴	Boswell⁴	West Knox⁴	Kentland⁴	Canal District⁴
Population ¹	2,490	778	1,029	1,748	834
Children ¹	26.9%	29.4%	32.6%	27.8%	27.2%
Seniors ¹	16.3%	16.2%	18.6%	10.3%	18.8%
Women Child-bearing ¹	23.6%	24.0%	25.8%	21.4%	21.6%
Unemployment ²	10.7%	12.9%	9.9%	9.2%	14.1%
Minority % ¹	2.8%	12.1%	4.8%	5.8%	8.3%
Hispanic % ¹	2.3%	15.0%	2.9%	8.0%	10.4%
Poverty Rate ³	20.0%	15.8%	35.1%	18.8%	23.8%
<50% Poverty Rate ³	6.2%	7.4%	15.1%	9.3%	7.1%
Median Household Income ³	\$33,553	\$37,857	\$24,153	\$43,580	\$33,545
Per Capita Income ³	\$19,124	\$17,240	\$11,820	\$21,911	\$13,452

¹Data from 2010 U.S. Census and is available at www.census.gov

²Data from Bureau of Labor Statistics (August 2013) and adjusted Target Employment Area data is available at www.bls.gov

³Data from 2010 American Community Survey (ACS) and is available at factfinder.census.gov

⁴Data obtained from ESRI Business Analyst dissection census tracts of adjusted U.S. Census Report and ACS available at www.bao.esri.com

(iii) The Coalition identified more than 690 potential brownfields (gasoline/service stations, bulk petroleum plants, machine shops, metal scrap yards, and manufacturing plants) of known or suspected environmental contamination (hazardous substances and petroleum products), most of which are located in or around the Coalition's communities and near one of the four river ecosystems. The Indiana Department of Environmental Management (IDEM) identified more than 250 sites of known impact in the Coalition area. These sites are predominantly located in low-income neighborhoods, adjacent to river ecosystems, or represent direct threats to drinking water sources. Residents are being exposed to brownfields contaminants via direct contact, ingestion, and inhalation pathways due to airborne particulates and vapor intrusion. The Coalition's overriding health and welfare concern is the concentration of brownfields in low-income areas and the brownfields' impacts to the sensitive populations and ecosystems. In addition, the rural agricultural bases of the counties are dependent on reliable, safe groundwater for drinking water sources, which are threatened by contaminants migrating from brownfields. The Coalition targeted five communities to begin to address these concerns. The table below lists health effects to sensitive populations from contaminants at sites in the targeted areas.

Target Community(Site)	Contaminants	Health Effects¹
Canal District - Delphi (former paper mill, Revington-Peters, Glove Valve): paper, furniture, steel plant 98 acres	Asbestos, metals volatile organic compounds (VOCs) polycyclic hydrocarbons (PAHs), PCBs, dioxins	Headaches; poor coordination; respiratory problems; stomach brain, liver, kidney, nerve, lung damage and cancers; blood vessel damage
Sensitive receptors: Poor residents with seniors exceeding national rate by 44.6%, Canal District poverty rates 57.6% higher than U.S. rate with percentage of minorities 193% and Hispanics 231% higher than KIRPC average; unemployment rate nearly double (1.95x) of national rate; visitors to Wabash & Erie Canal Interpretive Center trail system- campground-park, Carroll County Historical Museum and trail system all which adjoin the sites: sites adjoin canal which discharges to Wabash River; sites are abandoned and vacant with portions unsecure attractive to vagrants and children visiting interpretive center		
Kentland (Bonnell Aluminum) aluminum manufacturing 38 acres	VOCs, metals, organic solvents, PAHs, asbestos, PCBs	Lung cancer, skin irritation; respiratory problems, blood vessel damage, birth defects, headaches; poor coordination; liver, kidney, nerve damage



Sensitive receptors: Poor residents with those living below the 50% poverty rate 43% higher than U.S. rate and 16% more children than national average, stormwater and runoff impacting a county drain located 150 feet from the Bonnell site which discharges to the Kankakee River; vacant unsecured site attractive to children, vagrants and illegal activity		
West Knox (Rockwell Window/Nor-am Plastics) 23 acres	VOCs, PAHs, and chlorinated solvents, metals, phthalates	Respiratory damage/failure; anemia bone marrow problems; nerve, liver, kidney damage; stomach, liver, bladder cancer
Sensitive receptors: Extremely poor adjoining residential neighborhoods with poverty rates (35.1%) and those more than 50% below poverty line (15.1%) rates 2.3 times higher than U.S. rate and 58.4% of population children and women of child bearing age of childbearing age: within ¼ mile of elementary school; sites adjoin drain with conveyance to Kankakee River; both sites are abandoned and accessible to public.		
Winamac Rail Corridor (former, salvage, gas stations manufacturing, mills) 18 acres	VOCs, chlorinated solvents, PAHs metals	Respiratory damage/failure; anemia, bone marrow problems; nerve, liver, kidney damage, stomach; bladder, liver, cancer
Sensitive receptors: Poor residential/mobile home parks adjoin the Corridor with higher than average number of seniors and poverty rate of 20.0% that is 24.5% higher than U.S. rate; exposure threats to children attending the adjoining KIRPC Headstart Preschool and the 1 st Christian Church Preschool; town park and Tippecanoe River located within 900 feet of sites; Corridor is unsecure and former rail grade used by children as school route, vacant/ unsecured buildings attractive to children/illegal activity. USDA Food Desert area designation.		
Boswell (gas stations, armory, auto repair, former manufacturers) 15 acres	VOCs, chlorinated solvents, PAHs metals, fertilizers, pesticides	Respiratory damage/failure; anemia, bone marrow problems; nerve, liver, kidney damage, stomach; bladder, liver, cancer
Sensitive receptors: Poor residents with higher percentages of children, seniors and women of childbearing age than U.S. rate, percentage of minorities 2.8 times and percentage of Hispanics 3.3 times higher than the KIRPC rates and per capita income 36.9% and 28.3% less than U.S and Indiana rates, respectively; park visitors (children) to the only town park adjoining to the west; municipal water wells one-tenth of northwest; sites are unsecure and subject to vandalism		

¹ Agency for Toxic Substances and Disease Registry (ATSDR). ToxFAQs

(iv) Other environmental issues the Coalition must contend with include: 390 existing Confined Feeding Operations (CFOs), over 450 petroleum production wells, 20 open dumps, 6 landfills, and 6 tire waste sites, all which are a direct threat to the drinking water sources and surface water quality; 21 active and former railroad systems, a multitude of state highways and interstate highway I-65, the main route between Chicago and Indianapolis. Additionally, the EPA lists four of the Coalition's counties as Zone 1 Radon Counties, having the highest radon impact rating with predicted average indoor radon levels greater than 4.0 pCi/L of air and the remaining four counties as Zone 2 counties with radon levels between 2.0 and 4.0 pCi/L (www.epa.gov/radon/zonemap). In the towns, the rail and transportation systems were built to service the industrial developments located in congested low-income neighborhoods, so residents of these communities have been disproportionately impacted by air emissions when compared to wealthier citizens who live on the outskirts, upwind of the industrialized areas. The low-income, rural residents are disproportionately impacted by the CFOs, landfills and dumps, and petroleum production wells. As shown in the table in Section 1.a.ii, the targeted communities have high numbers of low-income populations and higher than average numbers of seniors, children, and women of childbearing age, and, at some locations, higher percentages of minority and Hispanics relative to the rest of the Coalition area. These sensitive populations are disproportionately exposed to these cumulative issues and do not have the resources to protect themselves (e.g. radon testing and mitigation), creating environmental injustices.

b. Impacts on Targeted Community:

The residents in the Coalition's targeted communities are being disproportionately impacted by brownfields and the Coalition's low-income residents disproportionately live near the brownfields in the region. The low-income residents in the target communities have limited funds and abilities to travel, so they attend day care, school and churches in these neighborhoods, and play in parks adjacent to these sites. Their exposures to brownfields contaminants via direct contact, particulate ingestion and inhalation, and vapor intrusion inhalation pathways are more constant, the definition of environmental injustice.



According to *State Cancer Profiles, Incidence Rate Report for Indiana by County, 2005-2009*, despite the rural makeup of the Coalition area, cancer rates are elevated and alarming. The table below lists the types of cancer occurrences in each county and the counties' ranks within Indiana:

County	Cancer (Rank out of 92 Counties)	County	Cancer (Rank out of 92 Counties)
Benton	bladder (1), colon/rectal (1), prostate (7), All cancers (8), lung (20)	Pulaski	Leukemia (1), Bladder (13), colon/rectal (13),
Warren	3 rd least populous county, case numbers not statistically valid	White	thyroid (5), Lung (11), colon/rectal (15), prostate (16), uterus (20)
Jasper	stomach(1), prostate(1), thyroid(1), All cancers(2), lung(3), uterus & kidney(6), colon/rectal(7), non-Hodgkin lymphoma (10), bladder(10), oral(11), leukemia (15)	Carroll	Non Hodgkin lymphoma (1), pancreatic (2), bladder (5), prostate (8)
Newton	Oral (2) Kidney (17)	Starke	Breast (16), lung (16)

The elevated cancer incidence rates indicate Coalition residents have been impacted by both brownfields and active industrial operations. Asthma prevalence rates are also an immediate concern. Five of the eight Coalition counties were reported with elevated asthma rates. White (4th), Warren (9th), Benton (27th) and Starke (32nd) all were listed in the top one-third Indiana Counties for Age Adjusted Asthma Emergency Room visits. Jasper and Starke counties were listed as having the 19th and 20th highest rate of Hospital Discharges for Asthma (*The Burden of Asthma in Indiana, 2011*). Also, the report indicates that children, seniors and adult women are disproportionately affected by asthma and low-income populations are more greatly affected with higher asthma rates than mid-to upper-income populations by a factor of 3. This demonstrates a disproportionate impact from pollutants from industrial operations and brownfields to the Coalition's targeted communities and the micro communities' low-income residents.

Another concern is the impact brownfields are having on pregnancies and children. According to the Indiana State Health Department and U.S. Department of Health & Human Services websites, White, Carroll and Pulaski counties all rank in the upper 25% and Benton and Jasper counties rank in the upper 45% of Indiana counties for all birth defects with Pulaski county ranking 1st and White 12th for phloric stenosis and Jasper 7th and Starke 17th for hypospadias. Pulaski's infant mortality rate is a staggering 37% higher than the U.S. rate with Newton and White counties rates over 10% higher than the national average of over 10%. Teratogens including arsenic, lead, mercury, PCBs, paints, and organic solvents have been identified as site contaminants at the targeted communities' brownfields. The percentage of children with elevated blood lead levels is also a major concern with Pulaski reporting the 2nd, Warren 7th, White 9th, Benton 10th, Jasper 15th and Carroll 20th highest levels in the state. Clearly brownfields are contributing to the myriad of health conditions facing the Coalition and the poorest residents have the greatest, disproportional exposure to brownfields, creating an environmental justice issue for the most vulnerable citizens in the targeted communities and micro communities. Please note, all of the Coalition's cities and towns are micro communities, therefore this data is only available at the county level and incidence rates for individual micro communities may be even higher.

Another health and welfare concern is migration of contaminants from brownfields to the Kankakee, Iroquois, Tippecanoe and Wabash Rivers and their tributaries. Over 400 brownfields are located within a ¼ mile of these surface waters, threatening these sensitive ecosystems. Historically, streams and connected tributaries served as the waste conveyance system for industrial operations and urban runoff, impairing the rivers' ecosystems. These conditions present a threat to the viability of the rivers and watershed ecosystems and present exposure concerns for residents and visitors (via direct contact and ingestion) from the recreational use of the waterways. The river ecosystems are also home to twelve species of mussels, eight fish, ten birds, thirty plants and twelve mammals included in Indiana's Endangered, Threatened, and Rare Species program. These and other species require protection from contaminated run-off and groundwater.

c. Financial Need: The Coalition counties have been decimated by the recent economic downturn. Since 2008, multiple factory closings have eliminated thousands of jobs in the micro communities as evidenced by the unemployment rate of the Coalition partners (Knox and Delphi) ranging from 38% to 96% higher than the U.S. (Bureau of Labor Statistics-Target Employment Areas). With the loss of higher-paying manufacturing jobs, the economic bases crumbled, decreasing tax revenues and the money available for community investment. The Coalition needs funding to assess brownfields that are contributing to the demise of the targeted communities and assist the micro communities that cannot support their own brownfields programs.



Redevelopment of these sites will provide impoverished residents with sorely needed employment and increase the Coalition's tax bases, allowing for community investment.

(i) Economic Conditions The Coalition's financial need has resulted from the decrease in available revenue with which the Coalition's municipalities have to operate and provide redevelopment support. Indiana revised its property tax codes to provide property tax cuts at the same time the recession caused a reduction in property values, resulting in gross tax revenues being crippled. The average budgets of the Coalition's counties have decreased by over 11% from 2009 with Carroll and Jasper Counties being reduced by an average of 20%. The Coalition's micro communities have experienced even more dramatic budget reductions. The micro communities and targeted areas have smaller populations and brownfield assessment funds are unavailable so the grant to the Coalition represents their only hope of garnering assistance to conduct assessment and cleanup planning to facilitate brownfields redevelopment.

(ii) Economic Impacts of Brownfields The Coalition's primary financial concern is the lack of quality employment opportunities, which is disproportionately impacting impoverished residents in target communities and micro communities. In the last five years alone, poverty rates have increased for the Coalition counties ranging from 34.2% (Warren) to 62.7% (White), and Starke County is the 91st poorest county in Indiana, meaning that only one county is in more dire straits (*STATS Indiana, Counties in Profile*). Coalition area unemployment the last five years has averaged 0.2% higher than the national trends, which is expected for highly agriculturalized regions, however the micro communities have disproportionately suffered, with the average unemployment rate of the targeted communities 158% higher than the U.S. rate.

In the last ten years, the number of the Coalition's families living below the poverty level and receiving public assistance has increased an average of 67% and the number of families receiving food stamps has increased a staggering average of 244%. As shown in Section 1.a.ii, the target communities' neighborhoods surrounding the priority brownfields have the lowest per capita income rates in the Coalition, significantly lower than Indiana and the U.S. and poverty rates in the targeted communities and micro communities range from 1.5 to 2.3 times the national poverty rates. The population living under the 50% poverty line is equally disturbing. The Coalition desperately needs to reverse the trends of increased commuting costs and decreased wages for its residents. The brownfields within the targeted communities have also decimated property values. According to the American Community Survey, the average home values in the targeted communities are up to 39% lower than the Coalition county average and 55% lower than the average Indiana home. The targeted communities are faring even worse. For example, the canal district homes are valued 38% lower than the rest of the City of Delphi homes despite the significant waterfront and the trail and park system that weaves through the community, all which should increase home values. Decreasing property values result in low to negative asset growth, resulting in less investment by residents. In a vicious cycle of environmental injustice, the same brownfields that cost resident's access to local, good-paying jobs are decreasing their property values. Unable to move, they are forced to travel farther for lower-wage jobs with increased transportation costs. Despite the dire economic conditions facing the Coalition, the Coalition made brownfield redevelopment a top priority and has committed matching funds to this grant (Section 2.c). Based on the expected assessment scopes, the assessment/cleanup planning costs associated with brownfields in targeted communities are estimated to be at least \$800,000. Without an Assessment Grant, the Coalition will not be able to support the assessment of these brownfields and begin the process of redeveloping these sites which are impacting the economic viability of the Coalition's micro communities.

2. Project Description and Feasibility of Success

a. Project Description

(i) The Coalition made redevelopment of brownfields a top priority. During development of the KIRPC's comprehensive plan, brownfield redevelopment was recognized by the citizens as one of the primary goals to spur new community investment in the struggling cities and towns. To address the citizens' objectives, the Coalition established the following **Assessment Grant Goals** as metrics to select sites for funding: 1. protect citizens from brownfields direct contact exposures; 2. improve the deplorable poverty rates in targeted communities by redeveloping brownfields to create high-paying jobs; 3. mitigate exposure hazards and revitalize blighted neighborhoods without displacing residents; 4. stimulate redevelopment to increase property values and job growth within walking distance to poor neighborhoods; 5. protect the Kankakee, Iroquois, Wabash and Tippecanoe rivers' ecosystems from brownfields impacts via uncontrolled runoff and groundwater migration, and 6. support redevelopment that enhances and expands existing greenspace and linear parks consistent with land use plans developed in the Coalition members' comprehensive plans. The **Assessment Grant Goals** coincide with the EPA's guiding Livability Principles.



The brownfields program approach is directed by the **Assessment Grant Goals**. The grant project will start with addressing a minimum of five sites in the Coalition, including at least one in each targeted community. The target communities were chosen based on community needs and stakeholder knowledge that redevelopment of the priority sites in the target communities will act as catalysts, providing the highest return on grant funds and that agree with citizens' desires.

The **Canal District** target community includes assessment of the former Peters-Revington (PR), Globe Valve and a former paper mill. These three sites adjoin the nationally-acclaimed Wabash and Erie Canal Interpretive Center which includes the canal, Canal Park, Pioneer Village and campgrounds. The Globe Valve site, closed ten years ago, resulted in the loss of over 200 jobs and, in 2013, the closure of Peters-Revington (historically providing over 300 jobs), dealt the final blow to Delphi, a community of less than 3,000. Extensive Phase II Environmental Site Assessments (ESAs) are planned to evaluate the risks to the canal (and Wabash River), residents (vapor intrusion) and visitors to the Interpretive Center/Park (direct contact). The Carroll County Wabash & Erie Canal association desires to expand both of their campgrounds and redevelop a portion of the PR site into an indoor museum. The Coalition plans for the remaining area to be redeveloped with a high-tech industrial park, bringing new jobs to Delphi.

The **Kentland** target community contains the former Bonnell Aluminum site, a 38-acre site with a 200,000 square foot manufacturing building. When the aluminum extrusion plant closed in November 2012, 146 high-paying jobs were lost, representing over 15% of the workforce in a town of less than 2,000. The Coalition desperately needs to attract a new employer to replace the lost jobs and resurrect Kentland. The Bonnell brownfield represents threats of contaminant vapor intrusion into nearby residential buildings and direct contact threats, as well as a direct threat to the Kankakee River ecosystem. The Coalition needs the Assessment Grant to assess the Bonnell site, evaluate health risks to residents and future workers, and prepare the site for reuse. It is anticipated that extensive Phase II ESA work will be required to assess the nature and extent of contamination and develop remedial planning, including implementation of engineering controls and hazardous materials abatement to permit safe reuse.

The target community of **West Knox** contains multiple brownfields in addition to two priority sites, the former Rockwell Window and Nor-Am Plastics plants. The 17-acre Rockwell site contains a 200,000 square foot building, and the 6.5-acre former Nor-Am site contains a 106,000 square foot building. The vacant sites are located in close proximity to neighborhoods, a park and elementary school and adjoin a county drain presenting a direct threat to the Kankakee River. In addition to posing direct threats to residents and the Kankakee River, these sites have been identified as a priority redevelopment sites to attract new employers to the City of Knox. An extensive Phase II ESA is anticipated to facilitate cleanup planning for removal of hazardous materials (asbestos, chemicals, etc.), contaminated soil, groundwater treatment, and exposure controls, to protect residents and new workers and limit impacts to the river.

The **Winamac Rail Corridor** in the Town of Winamac runs from the south corporate limits to the north corporate limits. The property is approximately 100 feet wide by 7,800 feet long and is owned by the Town of Winamac. There are no buildings on-site, but it adjoins numerous abandoned brownfields and two daycare/preschools and playgrounds. The town plans to extend the Panhandle Pathway in the corridor through town and redevelop the adjoining vacant buildings with new commercial, professional and residential use that will provide new job opportunities to the poor residents of the target community. Portions of the site are also being planned for community vegetable gardens and a farmers market. Due to the unique nature of this property, the citizens and town leaders believe redevelopment could be a lynch pin to transform the downtown and spur other brownfield redevelopment projects. Impacts from past railroad operations and abandoned adjoining industrial sites represent a threat to the Tippecanoe River, which has been named by the Nature Conservancy as one of the top 10 rivers to preserve in America. By determining the nature and extent of the environmental impact created by the former rail and adjoining industrial operations, the Coalition will be able to assess the imminent health risk to residents using and near the corridor and determine required remediation to allow safe trail and commercial/residential reuse.

The **Boswell Old 41 Corridor** has been identified as a target area based on interest in two sites by developers and at least 15 brownfields that occurred from a highway realignment. On one site, a new owner wants to open a grocery store site because Boswell does not have a grocery store, forcing residents to drive over fourteen miles to neighboring towns to buy food. According to the new owner's business plan, the commercial redevelopment would produce approximately ten jobs. On the second site, a developer is interested in expanding their business. Both sites have had underground storage tanks removed, but no



contamination assessments. Potential impact at these sites also presents a direct threat to Boswell's water supply wells. The sites will require comprehensive assessment and remedial planning for safe reuse.

(ii) The Coalition is prepared to begin the assessment grant project immediately upon award. The Coalition has already met to discuss the framework of the Memorandum of Agreement (MOA). After being awarded the Assessment Grant, the Coalition will prepare a Work Plan with community support (Section 3.) for EPA approval and issue a contractor request for qualifications, with a deadline of retaining a contractor within eight weeks of issue. The Coalition and a qualified environmental consultant (the project team) will lead the brownfields program (Section 5.a) which will begin by preparing an overall 36-month project budget to ensure the project remains on schedule. KIRPC will act as lead organization on the project and provide the staff for day-to-day grant operations including: updating/maintaining the brownfields inventory; distributing project information to the community; assessment site selection; and progress tracking. KIRPC will be responsible for procuring contractual services and submitting the required reports to the EPA. The other Coalition members and micro communities will work closely within a partnership. KIRPC has an established working relationship with all of Coalition's communities and will work with property owners and the municipalities to secure site access for assessment activities.

The project team will focus on expanding the Coalition's brownfield inventory. Because of legal issues associated with publicly listing private properties, the inventory will focus on developable sites and secure permission to add these sites to the inventory and publicly listed contaminated sites. The Coalition, environmental consultant, and community organizations (Section 3.) will be involved in the inventory, which will continue throughout the grant period. After being deemed eligible by the EPA and community notification, sites will be assessed through performance of a Phase I Environmental Site Assessment (ESA) and/or a Phase II ESA. ESA procedures will be instituted to ensure that the community is protected from contaminants during assessment work (Section 4.a). Upon receipt of assessment results, the environmental consultant will work with the Coalition and community partners to devise liability management, cleanup, and site use strategies that support redevelopment and improve the environment and health of residents. After completion of initial assessment activities, investigations may be needed to further define the extent of contamination and design environmental response actions for cleanup and safe reuse use of the site. Contaminated sites may be entered into the Indiana Brownfields Program (IBP), Voluntary Remediation Program (VRP), or Underground Storage Tank (UST) Program. The results of assessments will be disseminated to the community via public meetings and notification of community organizations (Section 3.). If health threats are identified, IDEM and appropriate County Health Department will be notified (Section 3.b). If needed, the Coalition will seek additional funding from local and state sources and/or the EPA (Section 2.c) for assessment activities and subsequent environmental response activities. The project team will meet monthly to ensure individual projects are progressing, overall project schedule benchmarks are being met, and the grant project is completed within the three-year time limit.

(iii) Redevelopment plans meeting the objectives outlined in community-driven **Assessment Grant Goals** will be considered for grant funding. Site access will be obtained for property transactions via the purchase agreement; for foreclosures access will be obtained from the County or lender depending on the type of foreclosure (tax or loan); and the Coalition will obtain access through local nuisance abatement authority if exists) or work with IDEM for sites that present an imminent threat to public health. As previously discussed, brownfields in the targeted communities will be given top priority for funding. Secondary priority will be given to other sites that are believed to be impacting residents and sites with an interested, viable developer. The assessment grant will also provide support for businesses and micro communities to spur redevelopment of smaller sites throughout the Coalition area. By assessing these key sites, the Coalition hopes to improve the vitality of existing neighborhoods, create jobs, increase greenspace and improve recreational opportunities. With this approach, the Coalition will support revitalization of hardest-hit areas, mitigate immediate health and environmental threats, provide support to enhance economic development, and create jobs. These assessments will support redevelopments in areas with existing infrastructure, create local jobs and amenities, and create and protect greenspace responsibly. When redeveloped, these sites will increase commercial and manufacturing growth in impoverished neighborhoods and reduce the need for residents to commute long distances to find employment. Assessment data will determine the extent of brownfields contamination; evaluate exposure pathways and develop mitigation/remediation strategies protective of human health and the environment; and support redevelopment planning and marketing of brownfields. This approach may be revised if goals for outputs/outcomes (Section 2.b) are not being met or community concerns arise.



b. Task Description and Budget

Task 1 Programmatic Costs: Programmatic costs are \$6,050. The Coalition is providing all personnel costs except for \$3,650 (hazardous substances) for updating and maintaining brownfields information in the Assessment, Cleanup, and Redevelopment Exchange System (ACRES) system (\$50/hour for 73 hours). Once a site has been determined to be eligible, it will be entered into ACRES. The ACRES profiles will be updated after completion of Phase I and II ESAs, remediation, and/or redevelopment. The petroleum grant includes attending one EPA Brownfields Conference and an additional brownfield conference (\$1,200/ trip).

Task 2 Community Outreach: Community outreach costs are \$10,600. Included is \$1,000 (\$500 each grant) for printing, and mailing project information and documents to citizens and community stakeholders and contractual costs of \$9,600 for conducting community outreach and stakeholder meetings (\$5,000 for hazardous substances grant and \$4,600 for petroleum grant). *Output=minimum of 4 kickoff meetings, 30 monthly meetings, 3 project closeout meetings.*

Task 3 Site Inventory and Selection: The Coalition has an initial inventory; the budget includes inventory maintenance costs of \$4,850, which includes travel costs of \$650 for identifying new sites and showing sites to interested parties (\$250 for hazardous substances grant and \$400 for petroleum grant). The environmental consultant will assist in compiling the inventory list throughout the project at a cost of \$4,200 (\$2,100 each grant). *Output=100 new brownfields identified.*

Task 4 Site Assessment: Sites will be evaluated through performance of Phase I and/or II ESAs in accordance with All Appropriate Inquiry (ASTM Standard E1527) and other ASTM standards. The Coalition will focus grant funds on performing assessments, especially Phase II ESAs, to determine the nature and extent of the contamination at priority sites where the history is known. For these sites, a Phase I ESA may not be required. For priority sites with an imminent property transaction, a Phase I ESA will be completed regardless of historical knowledge. The Coalition also anticipates supporting due diligence at sites where business interest occurs during the project. Based on past experience, anticipated Phase I ESA costs will range from \$5,000 to \$8,000 and Phase II ESA costs will range from \$15,000 to \$60,000. The hazardous substances grant budget includes contractual costs of \$366,000 based on six Phase I ESAs at \$7,000 each (\$42,000 total), and eight Phase II ESAs at \$40,500 each (\$324,000 total). The petroleum grant budget includes contractual costs of \$172,000, based on five Phase I ESAs at \$5,000 each (\$25,000 total) and seven Phase II ESAs at \$21,000 each (\$147,000 total). These are averaged costs used for budgeting. Actual costs may vary. *Output=11 Phase I ESAs and 15 Phase II ESAs completed.*

Task 5 Cleanup Planning: The Coalition will conduct cleanup planning as required by the IBP, VRP, or UST programs for brownfields where redevelopment is imminent. This may include preparing Remediation Work Plans (RWPs), assessing brownfields cleanup/redevelopment alternatives, or evaluating institutional and engineering controls. Contractual costs for this task are estimated at \$22,500 (hazardous substances) and \$18,000 (petroleum), based on completing two hazardous substances RWPs at \$11,250 each and two petroleum RWPs at \$9,000 each. *Output=4 RWPs and cleanup plans completed.*

Budget Categories	Petroleum Assessment Grant Project Tasks					
	Task 1 Programmatic Costs	Task 2 Community Outreach	Task 3 Site Inventory	Task 4 Site Assessment	Task 5 Cleanup Planning	Total Budget
(programmatic costs only)						
Personnel						
Travel	2,400		400			2,800
Supplies		500				500
Contractual		4,600	2,100	172,000	18,000	196,700
Total Budget	2,400	5,100	2,500	172,000	18,000	200,000
Budget Categories	Hazardous Substances Assessment Grant Project Tasks					
	Task 1 Programmatic Costs	Task 2 Community Outreach	Task 3 Site Inventory	Task 4 Site Assessment	Task 5 Cleanup Planning	Total Budget
(Programmatic costs only)						



Personnel	3,650					3,650
Travel			250			250
Supplies		500				500
Contractual		5,000	2,100	366,000	22,500	395,600
Total Budget	3,650	5,500	2,350	366,000	22,500	400,000

In order to evaluate progress, the Coalition will document the outputs listed above. The Coalition will also measure the following outcomes: acres of land assessed, land remediated, and redeveloped, acres of parks and greenspace preserved or created; number of jobs created or retained; tax revenue generated; redevelopment investment value; and other funding leveraged. The Coalition will evaluate the project progress semi-annually to determine if funds are being expended as anticipated and if the completed assessments are catalyzing remediation and/or redevelopment investment and creating jobs. The Coalition will adjust the approach to selecting sites for funds if the project is not generating the expected outcomes.

c. Ability to Leverage:

Assessment Grants are vital for catalyzing brownfields redevelopment projects because they cover site assessment costs needed to support liability management, project design, and remediation planning. This alone is rarely sufficient to ensure a successful redevelopment. The Coalition understands this grant will not be a complete cure to the conditions brownfields have created and additional sources of funding to ensure a successful program will be required. The Coalition therefore is pledging resources to the project and will secure additional funds to supplement this grant. With the grant and supplemental leveraged funds, the Coalition will be able to immediately tackle these projects and facilitate redevelopment.

<u>Source</u>	<u>Resources Leveraged/Role of Resources</u>	<u>Estimated Value</u>	<u>Likelihood</u>
KIRPC	KIRPC meeting rooms	\$6,000 (\$2000/year)	100% will provide in-kind resources
KIRPC [†]	Staff for press releases, meetings, website, Facebook, LinkedIn updates for outreach Staff for site selection, oversee grant financial transactions to support programmatic activities	\$50 per hour/700 hours = \$35,000	100%
Indiana Dept. of Transportation (IndOT) (Winamac)	Safe Routes to School (SRTS) Grant for Rail Corridor trail comprehensive plan	\$75,000	100% project complete
IndOT (Winamac)	SRTS grant to construct Rail Corridor trail	\$250,000	Dependent on grant award
Environmental Consultant	Documentation/reporting including: monthly grant status reports, QAPP and HASPs, attendance at project administrative meetings	\$10,000 (100 hrs. at \$100/hr.)	100% Consultant required to provide in-kind resources
Office of Community and Rural Affairs (OCRA) Stellar Community Grant (Delphi)	Comprehensive grant: historic preservation, affordable housing construction, sustainable projects – solar house, expand Canal District trail	\$10,000,000	100% grant awarded
Tax Increment Finance (KIRPC Counties TIF districts)	Property tax revenue generated from redevelopments for site acquisition, infrastructure and site improvements	Depends on development value	100% if redevelopment occurs in TIF district
Property tax abatement	Up to 10 yr. abatement property improvement/new equipment	Development value dependent	100% if eligible

[†] Commitment letters are included in Attachment C.

The following existing state and federal resources are also available by application and may be used following expenditure of grant funds:

- OCRA – Indiana Main Street, Stellar Community, Demolition Grants.



- EPA Clean Water State Revolving Fund and Indian Brownfields Program (IBP) Revolving Loan Fund (RLF) – loans for cleanup/remediation activities.
- Excess Liability Trust Fund (ELTF) – reimbursement of monies spent to clean up petroleum releases from underground storage tanks (USTs).
- State of Indiana Economic Development for a Growing Economy, Headquarters Relocation Tax Credit, Hoosier Business Investment Tax Credit, and Industrial Recovery Tax Credit - tax credits and abatements for redevelopments.
- Additional EPA Assessment, Cleanup, and RLF Grants –Assessment grants (\$400,000/grant), cleanup (\$200,000/grantee-owned site), and RLF (up to \$1 million).

3. Community Engagement and Partnerships

a. Community Involvement Communication Plan: The Coalition understands the importance of community involvement in planning and recognizes successful engagement requires proactive communication. During formation of the KIRPC Comprehensive Plan, feedback from communities guided development of goals, which included addressing priority brownfields. The Coalition identified residents, property owners, local businesses, lenders, developers and concerned citizens as stakeholders for the grant project. Stakeholders will be involved with assisting the Coalition with site selection for assessment, reuse planning and cleanup decisions. Following notice of an Assessment Grant award, the Coalition will announce the award and the availability of the draft Work Plan to the community through a press release to each of the eight county newspapers and county Chamber of Commerce newsletters, and by posting notices on the all of the Coalition's counties' websites. The Coalition will announce the award on local area radio stations (WRIN 1560 AM, WLQI 97.7 FM and WMRS 107.7 FM) to reach less literate residents and send notices to local business leaders. The Coalition will establish a Facebook and LinkedIn group for the grant to allow community interaction during the project. The Coalition will include instructions on reaching these forums in all press releases and published information. Because three target communities have Hispanic populations over twice the Coalition counties' rates, the Coalition will provide Spanish translation services if requested, through an existing relationship with Purdue University. Hard copies of the draft Work Plan will be located at KIRPC and Coalition communities' offices and local public libraries for access by those without computer access or skills. The public will be able to provide comments verbally to the Coalition, by electronic postings, or in writing via email or letters. The comments will be discussed in public meetings held in each of the target communities and at other locations across the Coalition area. The draft Work Plan will be modified in response to relevant comments. To reach all residents, meeting notices will be included with tax and water bills.

Following Work Plan approval, the Coalition will schedule kick-off meetings in each targeted community and other locations across the Coalition to acquaint the communities with the project and reaffirm the Assessment Grant Goals. To ensure the targeted communities are engaged, the project team will canvas target neighborhoods with the meeting announcements. Kick-off meetings will be broadcast via a webinar for citizens who cannot attend. The Coalition will ask the public to identify brownfields they feel are impacting health and welfare, which will be added to the brownfields inventory. The meeting presentation materials and minutes will be posted on Facebook, LinkedIn, and Coalition members' websites with hard copies available at various locations as described above. As sites are selected, the Coalition will present the reasoning for selection at public meetings and solicit feedback. The Coalition will use community comments, project viability, and compatibility with the **Assessment Grant Goals** as metrics to access grant funds. Monthly updates will be provided at public county/town meetings and the project team will attend community organization meetings to discuss projects results.

After completing an assessment, information will flow outward to the community, notifying local stakeholders of results, and explaining health and environmental impacts. Assessment results will be posted on the Coalition members' websites, Facebook, and LinkedIn with hard copies available as previously described. If health threats are identified, written notices will be sent to impacted citizens, and the appropriate County Health Department will be contacted. When cleanup and/or redevelopment planning is initiated, explanations of plans and solicitation of comments on those plans, will be implemented. The project team will hold pre-scheduled open public monthly meetings for stakeholders to solicit feedback on the assessment grant findings and way to promote and improve project outcomes. At project close, the Coalition will hold a final public meeting to discuss the project outcomes. The presentation materials/minutes will be archived on the Coalition member's websites, Facebook and LinkedIn with hard copies in local libraries and KIRPC communities' offices.



b. Partnership with Government Agencies:

(i) The Coalition will develop partnerships with local and state environmental/health agencies to ensure that the project is successful. The Coalition's County Health Departments have been instrumental in community education programs related to, methamphetamine laboratories, lead poisoning, and groundwater protection. The health departments can provide blood lead testing and can provide groundwater testing and will use their experience to help identify/verify health risks posed by contamination; identify toxicological issues; perform risk evaluations; conduct notification/education programs; and coordinate health testing if warranted.

Since there is no local environmental oversight agency, the Coalition will establish a strong partnership with the Indiana Department of Environmental Management (IDEM) to ensure assessment, cleanup, and redevelopment of brownfields is conducted in compliance with the rules and guidance promulgated by the IDEM VRP (Indiana VCP) and/or IDEM UST program, as applicable. Partnering with IDEM and/or Indiana Brownfields Program (IBP) district and headquarters staff will be important for technical support, resolution of regulatory or procedural issues, and interpretation of rules and guidance documents. For petroleum-impacted sites, IDEM will be involved in the site eligibility determination prior to assessment. IDEM will review and approve Remediation Work Plans and Remediation Completion Reports for sites where response actions are completed. If contamination discovered through assessments potentially impacts the health of local populations, IDEM and the local county health department will be notified and brought in as project partners. The cleanup criteria established by IDEM under the Remediation Closure Guide will be used to identify and address on-site health and environmental threats.

(ii) The Coalition will partner with the Indiana Economic Development Corporation (IEDC) to assist with site marketing and provide expertise in brownfield repurposing to create and retain jobs. The Coalition will consult with the Indiana Finance Authority Brownfields Sustainability Initiative to provide guidance into successful sustainable brownfield projects and Indiana Housing Authority for low-income housing guidance.

c. Community-based Organizations: The Coalition identified the following organizations as project partners. The organizations' letters of support are included in Attachment D.

Purdue University Cooperative Extension Service (PUCES): PUCES works to develop youth and strengthen agriculture, families and communities in KIRPC. PUCES will be a partner in communicating grant project information to the communities and donating its 75-seat facility for public meetings.

Benton Community School Corporation (BCSC): BCSC will be incorporating a classroom exercise about brownfields and economic development into the High School's economic curriculum. After the exercise is complete, the Coalition will offer the exercise to the other Coalition schools. The Coalition will also utilize the schools as another conduit to allow information regarding the grant project to flow outward. The Coalition will also require the environmental consultant lecture high school science classes on environmental consulting.

Starke County Environmental Management District (SCEMD): The SCEMD is an Indiana Solid Waste District for proper management of solid waste that conducts environmental educational seminars. SCEMD works with all three school corporations within Starke County to educate students on environmental education and awareness. The SCEMD will assist the Coalition with developing educational programs for the other Coalition counties, provide an outlet for information, and will be an integral resource partner on ecosystem protection, recycling, and building deconstruction. SCEMD will also be incorporating brownfield education, including information collected on grant-assessed brownfields into its educational seminars.

Nature Conservancy Wabash Rivers Initiative (NCWR): is a branch of the non-profit world-wide environmental conservancy group committed to preservation of the Wabash River watershed which includes the Coalition's major rivers. NCWR is working with multiple organizations and agencies to restore flood plains, reduce pollutants, and coordinate research. With four river systems, the NCWR's expertise will be critical to the Coalition to assist with protecting river ecosystems from brownfields impacts. THE NCWR also has an extensive network of community volunteers to assist with community outreach via newsletters and mailing lists.

Carroll County Wabash & Erie Canal (CCWEC): is a non-profit organization that has over 40 years' experience in canal and historic structure restoration and planning and constructing a 10-mile community trail system (Delphi). CCWEC will be a valuable resource in historic preservation and community-driven park creation. CCWEC has also pledged to assist the Coalition with the **Winamac Rail Corridor** trail development and community outreach through their existing network.



4. Project Benefits: The **Assessment Grant Goals** support growth that enhances the quality of life, creates economic vitality, preserves existing neighborhoods and eliminates environmental injustice. With an Assessment Grant, the Coalition will incentivize brownfield redevelopment in the targeted communities and support micro communities unable to, implement, and manage their own brownfields programs.

a. Health and/or Welfare and Environment Health: Brownfield redevelopment will reduce contamination and limit inhalation, ingestion, and dermal exposures, protecting the health and welfare of residents. The health and welfare benefits associated with the priority sites are summarized below. Similar benefits are expected from redevelopment of other brownfields.

Target Community	Redevelopment Plan/Benefits
Canal District	Hazardous building materials and chemicals will be identified and removed with a portion of building renovated for museum, park expansion and city trail connection, and remainder of the sites utilized for new mixed use commercial and hi-tech manufacturing. Petroleum, chlorinated solvent and metal impacted soil and groundwater will be identified and remediated to limit vapor intrusion and direct contact to park visitors. Contaminated stormwater and groundwater will be eliminated, protecting the canal and Wabash river.
West Knox	The extent of contaminated soil and groundwater will be identified for cleanup to address direct contact concerns for low-income residents. If needed, an exposure barrier will be constructed to allow safe reuse of the site as previously described and to eliminate contaminated stormwater and groundwater, protecting the Kankakee River. Waste/junk materials and USTs will be removed and recycled.
Winamac Rail	The extent of metals, VOCs, PAHs, and solvent contamination of soils and groundwater will be determined, and exposure risks to both trail park visitors and adjoining neighborhoods will be assessed from both the former railroad operations and adjoining industrial properties. If needed, soil and groundwater cleanup planning will begin, including the installation of barrier systems to provide safe reuse as a linear park with mixed commercial/residential reuse.
Boswell	Hazardous building materials will be identified for abatement as necessary. Exposure risks, including direct contact and vapor intrusion to adjoining residents and the property will be evaluated and mitigated. The groundwater threats to the Town's municipal water supply wells will be evaluated. The extent of contamination will be defined, and if necessary, barrier systems and soil/groundwater cleanup planning will begin for commercial reuse.
Kentland	Hazardous building materials will be identified for abatement or management in-place and waste chemicals removed. USTs will be identified and assessed. VOC, PAH and metal impacted soil/groundwater will be identified for possible remediation to limit vapor intrusion concerns to poor adjoining residents and eliminate contaminated stormwater/groundwater, protecting the Kankakee River, preparing the site for immediate industrial reuse.

Redevelopment of these brownfields epitomizes the equitable development principles of utilizing new investment in economically disadvantaged neighborhoods to directly benefit residents. Because this work will be completed on existing industrial sites, residents will reap the benefits without being displaced. These outcomes coincide with the Livability Principles¹ of increasing economic competitiveness, leveraging federal investment, valuing and supporting community and neighborhoods. The redevelopment of brownfields will limit nonpoint pollution sources and discharges to improve water/sediment quality river ecosystems, reducing contaminants and improving aquatic life and increasing recreational opportunities.

Assessment Grant operating procedures will ensure that the community is protected from contaminants during assessment work. A Health and Safety Plan (HASP) will be completed for each site where intrusive sampling will occur, and access to the site will be controlled during the assessment. When subsurface or building material samples are collected, the release of particulates/vapors will be monitored and controlled through use of engineering controls and specialized work practices. Decontamination/purge water will be containerized on-site and appropriately disposed. The Coalition will use the assessment data to determine how to protect the community prior to, during and after redevelopment activities.

¹ Principles adopted by the partnership between the U.S. EPA, United States Department of Transportation and United States Department of Housing and Urban Development to promote smart growth.



b. Environmental Benefits from Infrastructure Reuse/Sustainable Reuse:

(i) Sustainable development principles including focusing development on existing cities, matching land uses to available infrastructure, and protecting natural resources and greenspace are woven into the **Assessment Grant Goals**. As one of the largest renewable wind energy regions in the country, the Coalition will be actively marketing brownfields to renewable energy companies, with the goal of making the region the national leader in renewable and wind energy development and manufacturing. Because brownfields in the Coalition are developed with abandoned manufacturing buildings located in urban areas served by existing infrastructure, the reuse of these sites epitomizes sustainable redevelopment. The Coalition will only provide Assessment Grant funds and other local programs for projects where necessary infrastructure exists or can be upgraded at a reasonable cost. By incentivizing brownfield redevelopment in this fashion, the Coalition will direct development into areas with existing infrastructure, limiting expenditures on utility extensions, reducing the use of construction materials and air emissions from construction. The Coalition will be involved in brownfield redevelopments and will encourage/require the use of green site investigation (e.g., in-situ data loggers, direct-push drilling, and solar-powered equipment and charging systems,) and remediation techniques (e.g., idling reduction plans for equipment, diesel vehicle retrofit technologies) during site cleanup and redevelopment. The Coalition will encourage incorporating innovative stormwater management techniques (rain gardens, bioswales, etc.), and other sustainable design approaches, such as demolition and construction materials recycling, and use of building materials with low-volatility into brownfields redevelopments. The Coalition is committed to implementing sustainability policies, something that can be difficult for small micro communities. For example, the Delphi stellar community grant includes sustainable designs and construction of a solar house. When existing buildings must be removed, the Coalition will encourage deconstruction, rather than conventional demolition, and will utilize county Habitat for Humanity ReStores as one method to help ensure building components are recycled. The Coalition will encourage the installation of energy efficient heating/cooling and lighting systems, resulting in reduced resource use and operating costs, and encourage redevelopments to pursue certification through the Leadership in Energy and Environmental Design (LEED) program. These sustainable approaches will help reuse existing resources, reduce fossil fuel, energy use, emissions and waste generation during redevelopment.

(ii) Each of the planned redevelopment projects in the targeted communities discussed in this application meet no less than two of the criteria that define the EPA's Livability Principles, sustainable and equitable cleanup and reuse approaches, sustainable development and equitable development. The Coalition has experience incorporating sustainable development with brownfields, the Canal Interpretive Center is an example and the City of Delphi's (Coalition partner) stellar community experience will allow them to lead the Coalition in establishing sustainable policies for micro communities.

c. Economic or Non-economic Benefits:

(i) Brownfield redevelopment will create jobs, increase tax bases, and preserve/enhance greenspace, all which meet the Coalition's **Assessment Grant Goals**. The Coalition believes increased manufacturing, retail, and recreational options spurred by brownfields redevelopment will improve living conditions, attract new development, maintain the vibrancy of commercial districts and prevent generation of new brownfields. Expanded commercial districts will improve the tax bases within the Coalition and diversify the communities' work forces, rendering them less vulnerable to economic swings. These outcomes coincide with the guiding Livability Principles of valuing/supporting community neighborhoods and increasing economic competitiveness. In addition to increase in tax base, redevelopment in the target areas will have the following economic benefits:

Canal District: The redevelopment of the three primary sites will provide an estimated 450 new jobs to Delphi by attracting new manufacturing and commercial enterprises. The reuse of these sites will also allow for expansion of the Canal Interpretive Center adding more campsites, a museum and expansion to the current trail system and remove the adjoining eyesores to this cherished piece of history. Private investment is estimated to be approximately \$30 million. Portions of the sites could be used as a new technology/business incubator for renewable energy firms. Anticipated cleanup costs are estimated at \$1,000,000 and require approximately \$200,000 of assessment grant funds. The total grant leverage (investment and cleanup costs compared to assessment funds) will be 105:1.

West Knox: The redevelopment of these two sites will provide an estimated 300 new jobs to Knox by attracting new manufacturing and commercial enterprises. The reuse of these sites will produce a private investment estimated to be approximately \$4 million. Portions of the sites could be used as a new technology/business incubator for renewable energy firms. Anticipated cleanup costs are \$300,000 and



require approximately \$90,000 of assessment grant funds. The total grant leverage (investment and cleanup costs compared to assessment funds) will be 48:1.

Kentland: Redevelopment calls for attracting a new employer to replace the devastating job losses in Kentland. The site will be returned to a manufacturing providing much needed jobs with an estimated investment of over \$5 million and will create upward of 350 jobs. Anticipated assessment grant funding is \$75,000 with an estimated \$250,000 of cleanup costs to allow for safe reuse for a total assessment grant leverage of 70:1.

Winamac Rail: Redevelopment of this site as an extension to the Panhandle Pathway will result in the ability of Winamac to host cycling tours and running races, with the Town benefiting from the increased tourism. A local business owner is planning on opening a new bicycle shop along the trail, and redevelopment of the host of brownfields adjoining the former rail corridor with mixed-use commercial, professional offices and residential will result in an investment of \$7 million with trail construction funded by the SRTS \$250,000 grant and provide an estimated 150 new jobs within walking distance to low-income residents and new residential space for 20 families. Increased tourism will also result in an estimated additional \$200,000 a year and the project will act as a catalyst for additional investment in the downtown district. A farmers market is planned at the trail head helping to diminish the urban food desert syndrome by providing access to fresh foods. Cleanup costs are estimated to be \$500,000 and require \$150,000 of assessment funds. Total grant leverage 52:1.

Boswell: Initial redevelopment of the two sites with current developer interest will result in an investment of approximately \$1 million with an estimated cleanup of \$100,000, add an estimated 20 new jobs and act as catalyst developments to the corridor. The community will benefit by eliminating the need for families to travel to purchase food supplies. Assessment costs of \$50,000 will result in a grant leverage of 22:1.

The redevelopment of priority brownfields will also result in creation of additional greenspace. All of the new planned redevelopment projects will include open and accessible spaces and will promote the use of pedestrian/ bike paths. Winamac Rail will create a linear park will expand the popular Panhandle Pathway into the center of the town and will also allow it to be connected to the Tippecanoe State Park located 3.5 miles north of Winamac. This will further enhance the ability to host athletic events such as bicycle tours, road races and connect the town to campgrounds. The Canal District will expand an existing park, extensive trail system and cultural center. The Coalition has demographics shifting towards an older population and, with the economic downturn, residents are turning to community parks as an inexpensive family activity. These changes require a shift towards accessible trail and park systems that offer family-friendly opportunities. According to the CDC, in 2009, over 30% of the adult population in each of the Coalition's eight counties was obese; many more were overweight. The Coalition hopes that redevelopment of some brownfields into greenspaces and additions to the burgeoning walking/multi-modal trail system will help to encourage healthier lifestyles in the communities. The Coalition recognizes it must expand and connect its existing greenspace to improve the walkability of its communities and, by redeveloping some of the many brownfields with parks and greenspace, the Coalition can meet these requirements. Parks and urban greenspace along the waterways act as environmental and floodway buffers, keeping industry from infringing on sensitive ecosystems and assessment of brownfields along the rivers will facilitate the Coalition's acquisition of the needed lands.

(ii) There are no EPA Environmental Workforce Development/Job Training programs in the Coalition area. The Coalition will reach out to organizations in Indianapolis (75 miles southeast) and Gary (60 miles north) to determine if program graduates are available and will use the local County Workforce Board (WorkOne), Ivy Tech Community College and PUCES to promote local hiring for brownfields redevelopment activities. The Coalition will use its connection with Purdue University (10 to 50 miles south) to link Coalition residents to the required education and training necessary to secure employment in the environmental field.

5. Programmatic Capability and Past Performance:

a. Programmatic Capability: The Coalition is ready to implement an Assessment Grant and will request to begin community outreach activities prior to Cooperative Agreement approval. The project team will include representatives from the KIRPC, the Cities of Knox and Delphi, and an environmental consultant. The Coalition representatives will initially be responsible for developing the Memorandum of Agreement (MOA) between the Coalition partners, a framework which has already been discussed. The Coalition representatives will also determine which sites will be assessed with grant funds following the MOA guidelines. The experience and qualifications of these key project team members are discussed below:

Mr. Edwin Buswell, KIRPC Executive Director will serve as project director. Mr. Buswell has been with KIRPC since 1995. He has a Bachelor's degree in geography and a Master's degree in City and Regional Planning.



He is a certified planner with the American Institute of Certified Planners and is also a certified grant administrator with the State of Indiana. Since Mr. Buswell became Executive Director, KIRPC has managed over \$43 million in federal and state grants. Mr. Buswell will oversee all aspects of the grant management, run outreach and grant meetings, and work with targeted communities and stakeholders on redevelopment projects. Mr. Buswell will ensure all programmatic responsibilities of the Coalition are met.

Mr. Buswell will be supported by Ms. Shawn Cain, KIRPC Grant Administrator, who has been with KIRPC since 2011. She has successfully administered many different federal grant projects funded through different federal funding sources including U.S. Department of Housing and Urban Development, U.S. Department of Commerce, and U.S. Department of the Interior. She is a certified Community Development Block Grant Administrator with the State of Indiana and has taken training in federal environmental review and labor standards. Ms. Cain will attend outreach and project meetings and be familiar with the Assessment Grant Goals. Being closely involved with the grant operations, Ms. Cain can immediately step in as the replacement project director in case of loss of Mr. Buswell. Ms. Cain and the environmental consultant will be responsible for continued operations, and training of a new project director. The respective County attorneys will assist the Coalition and developers with liability management issues.

The Coalition will retain a competent environmental consultant to assist in managing and tracking activities funded by the Assessment Grants and conducting ESAs using a Qualifications-Based Selection Process that complies with the applicable federal procurement regulations (40 CFR §31.36). The consultant will be experienced in EPA Assessment Grant management and extensive experience with the Indiana Voluntary Remediation Program, successfully managed at least five EPA Assessment Grants projects, and at least three successful redevelopment projects that leveraged multiple brownfields financing incentives.

KIRPC works closely with the Coalition's County Economic Development Offices (CEDOs) to promote new and existing businesses in the Coalition area and provides access to real estate to support economic growth. The CEDOs will market brownfields and promote brownfield incentives and assist developers with site selection.

b. Audit Findings: The Coalition has not received adverse audit findings from an OMB Circular A-133 audit or an audit conducted by a federal, state, tribal, or local government inspector or similar organization.

c. Past Performance: The Coalition members have not been a previous recipient of an EPA Brownfields Assessment Grant. However KIRPC, the Coalition's lead applicant, has extensive experience managing federal and non-federal assistance agreements. Examples listed below:

Grant	Amount	Purpose	Outcome	Measurement Success
USEDA Public Works -Wolcott Corridor Infrastructure	\$2.4MM	Construct water/sewer lines, storage tank to increase industrial park by 86 acres	Under construction w/ private investment in shell building	Private investment \$ 50MM, create 100 jobs
USEDA Public Works Fulton Industrial Park Infrastructure	\$597,100	Extend water service to 75 acre parcel in Industrial Park	Under construction	Expected to create 152 jobs with \$50MM investment
USEDA Public Works Starke Industrial Park Intersection Improvements	\$503,000	Improve intersections into park to allow larger truck access	Construction to begin Spring 2014	Increased development of \$15MM and 80 jobs
US Health and Human Services Head Start	\$1.07MM	Early education/services to low-income children	Providing services to 148 families annually	Formal monitoring twice a year
USEDA Planning Partnership	\$196,884	Provide KIRPC funding for economic development and prepare comprehensive plan	Assist 8 counties, 38 micro communities with economic development, comp. plan created	During 3 grant cycles, completed 30 projects creating 400 jobs and \$100MM in private investment

The Coalition complied with funds disbursement requirements, financial tracking, reporting requirements, submitting technical documents, documenting project progress, and auditing requirements for the listed grants. The Coalition has the procedural knowledge to successfully disburse Assessment Grant funds and track Assessment Grant expenditures.



ATTACHMENT A

THRESHOLD DOCUMENTATION AND LETTERS OF COMMITMENT FROM COALITION MEMBERS



THRESHOLD CRITERIA

FY 2014 U.S. EPA BROWNFIELDS HAZARDOUS SUBSTANCES AND PETROLEUM ASSESSMENT GRANT APPLICATION

Submitted By: Kankakee Iroquois Regional Planning Commission, Cities of Knox and Delphi, Indiana

THRESHOLD CRITERIA

1. **Applicant Eligibility:** Kankakee Iroquois Regional Planning Commission (KIRPC) is a quasi-governmental entity created by State Statute (Indiana Code 36-7-7) and is applying as the lead coalition member of for KIRPC's eight county Brownfield's Coalition. The Cities of Delphi and Knox are the remaining Coalition members. KIRPC operates under the direct order of the Commissioners of each County and has been recognized and certified by an Executive Order of the Governor of the State of Indiana, a copy of which is included Attachment A. Letters of commitment from Coalition members are included in Attachment A and Letters of Support from the KIRPC Counties is included in Attachment C.
2. **Letter from the State or Tribal Environmental Authority:** A letter from the Indiana Department of Environmental Management (IDEM) is included in Attachment B.
3. **Community Involvement:** The Coalition understands the importance of community involvement in planning and recognizes successful engagement requires proactive communication. During formation of the KIRPC Comprehensive Plan, feedback from communities guided development of goals, which included addressing priority brownfields. The Coalition identified residents, property owners, local businesses, lenders, developers and concerned citizens as stakeholders for the grant project. Stakeholders will be involved with assisting the Coalition with site selection for assessment, reuse planning and cleanup decisions. Following notice of an Assessment Grant award, the Coalition will announce the award and the availability of the draft Work Plan to the community through a press release to each of the eight county newspapers and county Chamber of Commerce newsletters, and by posting notices on the all of the Coalition's counties' websites. The Coalition will announce the award on local area radio stations (WRIN 1560 AM, WLQI 97.7 FM and WMRS 107.7 FM) to reach less literate residents and send notices to local business leaders. The Coalition will establish a Facebook and LinkedIn group for the grant to allow community interaction during the project. The Coalition will include instructions on reaching these forums in all press releases and published information. Because three target communities have Hispanic populations over twice the Coalition counties' rates, the Coalition will provide Spanish translation services if requested, through an existing relationship with Purdue University. Hard copies of the draft Work Plan will be located at KIRPC and Coalition communities' offices and local public libraries for access by those without computer access or skills. The public will be able to provide comments verbally to the Coalition, by electronic postings, or in writing via email or letters. The comments will be discussed at public meetings held in each target communities and at other locations across the Coalition. The draft Work Plan will be modified in response to relevant comments. To reach all residents, meeting notices will be included with tax and water bills.

Following Work Plan approval, the Coalition will schedule kick-off meetings in each targeted community and other locations across the Coalition to acquaint the communities with the project and reaffirm the Assessment Grant Goals. To ensure the targeted communities are engaged, the project team will canvas target neighborhoods with the meeting announcements. Kick-off meetings will be broadcast via a webinar for citizens who cannot attend. The Coalition will ask the public to identify brownfields they feel are impacting health and welfare, which will be added to the brownfields inventory. The meeting presentation materials and minutes will be posted on Facebook, LinkedIn, and Coalition members' websites with hard copies available at various locations as described above. As sites are selected, the

Coalition will present the reasoning for selection at public meetings and solicit feedback. The Coalition will use community comments, project viability, and compatibility with the **Assessment Grant Goals** as metrics to access grant funds. Monthly updates will be provided at public county/town meetings and the project team will attend community organization meetings to discuss projects results.

After completing an assessment, information will flow outward to the community, notifying local stakeholders of results, and explaining health and environmental impacts. Assessment results will be posted on the Coalition members' websites, Facebook, and LinkedIn with hard copies available as previously described. If health threats are identified, written notices will be sent to impacted citizens, and the appropriate County Health Department will be contacted. When cleanup and/or redevelopment planning is initiated, explanations of plans and solicitation of comments on those plans, will be implemented. The project team will hold pre-scheduled open public monthly meetings for stakeholders to solicit feedback on the assessment grant findings and way to promote and improve project outcomes. At project close, the Coalition will hold a final public meeting to discuss the project outcomes. The presentation materials and minutes will be archived and placed in Coalition members' websites and offices, Facebook and LinkedIn with hard copies in local libraries.

4. **Site Eligibility and Property Ownership Eligibility:** This application is for a community-wide Coalition Brownfields Assessment Grant. Consequently, site eligibility and property ownership eligibility criteria are not applicable.

Information Maintained by the Office of Code Revision Indiana Legislative Services Agency

IC 36-7-7

Chapter 7. Regional Planning Commissions

IC 36-7-7-1

Application of chapter

Sec. 1. This chapter applies to any area consisting of two (2) or more counties (referred to as a "region" in this chapter).

As added by Acts 1981, P.L.309, SEC.26.

IC 36-7-7-2

Establishment

Sec. 2. (a) The legislative bodies of all the counties in a region may, by concurrent resolutions, request the establishment of a regional planning commission (referred to as a "commission" in this chapter). Official copies of the resolutions must be forwarded to the governor, who shall then appoint himself or a member of his staff to immediately notify the other members of the commission and to act as temporary chairman for the election of officers. The commission shall, by resolution, designate a name for itself that reflects the commission's role and function and that may include the words "Regional Planning Commission".

(b) This subsection applies to each commission established after July 1, 1978. A county participating in a commission is not subject to the tax imposed under section 12 of this chapter, unless all the concurrent resolutions establishing the commission accept the application of the tax.

As added by Acts 1981, P.L.309, SEC.26. Amended by P.L.144-1992, SEC.1.

IC 36-7-7-3

Counties transferring membership between commissions or joining existing commissions; procedure

Sec. 3. (a) A county may request a change in its participation from one commission to another, or request to join a commission if it is not participating, under subsection (b).

(b) The legislative body of the county must, by resolution, request the inclusion of the county in the commission. The county auditor shall transmit a copy of the resolution to the governor, the chairman of the commission, and, if applicable, the chairman of the commission that the county is requesting to leave.

(c) The commission to be joined may consider a request under subsection (b). It may, by a majority vote of all its members, adopt a resolution including the requesting county in the commission.

(d) Whenever a resolution is adopted under subsection (c), the chairman of the commission shall call a meeting to organize the enlarged commission. He shall call to this meeting all members of the commission plus:

(1) if the new county is changing its participation from one commission to another, the persons from that county who served on the commission that the county is leaving; or

(2) if the new county has not been participating, a representative of the executive of that county.

As added by Acts 1981, P.L.309, SEC.26.

IC 36-7-7-4

Members; appointment; compensation; certification; vacancies

Sec. 4. (a) The following members of the commission shall be appointed from each county in the region:

(1) A representative of the county executive who may be either a member of the executive or a person appointed by it.

(2) A representative of the county fiscal body who must be a member of the fiscal body.

(b) The following members of the commission shall be appointed from each county in the region having a population of more than fifty thousand (50,000):

(1) The county surveyor or a person appointed by the surveyor.

(2) Two (2) persons appointed by the executive of each municipality having a population of more than fifty thousand (50,000).

(3) One (1) person appointed by the executive of each of the seven (7) largest municipalities having a population of less than fifty thousand (50,000). If there are fewer than seven (7) municipalities, enough additional persons appointed by the county executive to bring the total appointed under this subdivision to seven (7).

(c) The following members of the commission shall be appointed from each county in the region having a population of less than fifty thousand (50,000):

(1) One (1) person appointed by the executive of each of the five (5) largest municipalities or of each municipality if there are fewer than five (5).

(2) If there are fewer than five (5) municipalities, enough additional persons appointed by the county executive to bring the total appointed under this subsection to five (5).

(d) One (1) voting member of the commission shall be appointed by the governor.

(e) At least two-thirds (2/3) of the commission members must be elected officials. All persons appointed to the commission must be:

(1) knowledgeable in matters of physical, social, or economic development of the region; and

(2) residents of the municipality, county, or region that they represent.

A member of the commission may also serve as a member of a plan commission in the region.

(f) Members of the commission shall serve without salary but may be reimbursed for expenses incurred in the performance of their duties.

(g) The respective appointing authorities shall certify their appointments, and the certification shall be retained as a part of the records of the commission.

(h) If a vacancy occurs by resignation or otherwise, the respective appointing authority shall appoint a member for the unexpired term. Members shall be certified annually, and their terms expire on December 31 of each year.

As added by Acts 1981, P.L.309, SEC.26. Amended by Acts 1981, P.L.310, SEC.63; P.L.144-1992, SEC.2; P.L.168-1994, SEC.1; P.L.165-2003, SEC.4.

IC 36-7-7-4.1

Repealed

(Repealed by P.L.165-2003, SEC.7.)

IC 36-7-7-5

Officers; meetings; notice; rules; record of proceedings; quorum

Sec. 5. (a) At its first regular meeting in each year the commission shall elect from its members a chairman, vice chairman, secretary, and a treasurer, not more than two (2) of whom may be from the same county. If the region is divided into subregions under section 10 of this chapter, there must be at least one (1) officer from each subregion. The vice chairman may act as chairman during the absence or disability of the chairman.

(b) The commission shall fix the time and place for holding regular meetings, but it shall meet at least quarterly and at such other times as may be established by the commission or the executive board. Special meetings of the commission may be called by the chairman or by five (5) members of the commission upon written request to the secretary. The secretary shall send to all the members at least forty-eight (48) hours in advance of a special meeting a written notice fixing the time and place of the meeting. Written notice of a special meeting is not required if the time of the special meeting has been fixed in a regular meeting, or if all the members are present at the special meeting. Notice of any meeting may be waived by a member by a written waiver filed with the secretary.

(c) The commission shall adopt rules for the transaction of business and shall keep a record of its resolutions, transactions, findings, and determinations, which is a public record.

(d) A majority of members constitutes a quorum. An action of the commission is official, however, only if it is authorized by a majority of the commission at a regular or properly called special meeting with at least one (1) member from each county in the region present.

As added by Acts 1981, P.L.309, SEC.26. Amended by Acts 1981, P.L.310, SEC.64.

IC 36-7-7-6

Executive board

Sec. 6. (a) The commission shall elect from among its members an executive board consisting of:

- (1) the four (4) officers of the commission;
- (2) one (1) member of the commission from each county in the region;
- (3) one (1) additional member of the commission from each county in the region having a population of more than fifty thousand (50,000); and
- (4) the nonvoting member of the commission appointed by the governor.

All members shall be elected by a vote of the full membership of the commission.

(b) If a vacancy occurs in the executive board a successor shall be elected from among the members in the same manner as the member whose position has been vacated.

(c) The executive board shall conduct the business of the commission, except for:

- (1) the adoption and amendment of bylaws, rules, and procedures for the operation of the commission;
- (2) the election of officers and members of the executive board as provided in this chapter; and
- (3) the adoption of the annual appropriation budget after review by the executive board.

(d) The executive board shall meet regularly at least once each month, unless otherwise determined by its members. The executive board shall notify the full membership of the commission of all its meetings with copies of its preliminary or final agendas and shall report all its actions and determinations to the full membership of the commission.

(e) A majority of members constitutes a quorum. An action of the executive board is official, however, only if it is authorized by a majority of the board at a regular or properly called special meeting. Any action of the executive board shall be reviewed at the next regular meeting of the commission following the executive board's action, and upon the written request of a member of the commission, the action shall be brought to a vote of the full commission.

As added by Acts 1981, P.L.309, SEC.26.

IC 36-7-7-7

Powers and duties

Sec. 7. (a) The commission shall institute and maintain a comprehensive policy planning and programming and coordinative management process for the region. It shall coordinate its activities with all units in the region and shall coordinate the planning programs of all units and the state. Except when a commission exercises powers under subsection (j), the commission shall act in an advisory capacity only.

(b) The commission may provide technical assistance to any unit in the region that requests it. This technical assistance includes the provision of skills and knowledge for planning, developing, administering, improving, and securing:

- (1) public and private grants-in-aid;
- (2) cooperative arrangements between governments; and
- (3) the performance of governmental powers and duties.

(c) The commission may divide its jurisdiction into subregions

under section 10 of this chapter for purposes appropriate to the study, analysis, or coordination of specific problems or concerns. The commission may conduct all necessary studies for the accomplishment of its duties. It may publicize and advertise its purposes, objectives, and findings and may distribute reports on them. It may provide recommendations when requested to the participating units and to other public and private agencies in matters relative to its functions and objectives and may act when requested as a coordinating agency for programs and activities of such agencies as they relate to its objectives. The commission may not implement, enter into an agreement for, or propose a program that includes interstate wastewater management or disposal.

(d) The commission may adopt by resolution any regional comprehensive or functional plan, program, or policy as its official recommendation for the development of the region, subject to the power of a county to exempt itself under section 9 of this chapter. The commission shall make an annual report of its activities to the legislative bodies of the counties and municipalities in the region.

(e) The commission may receive grants from federal, state, or local governmental entities or from individuals or foundations, and may enter into agreements or contracts regarding the acceptance or use of those grants and appropriations for the purpose of carrying out any of the activities of the commission. A county or municipality may, from time to time upon the request of the commission, assign or detail to the commission any employees to make special surveys or studies requested by the commission.

(f) For the sole purpose of providing adequate public services, the commission may acquire by grant, gift, purchase, lease, devise, or otherwise and hold, use, improve, maintain, operate, own, manage, or lease (as lessor or lessee) such real or personal property as the commission considers necessary for that purpose. The commission may apply for, receive, and expend grants, loans, or any other form of financial assistance available under any federal grant program.

(g) The commission may enter into coordinative arrangements with any adjacent county or municipality in Indiana or an adjoining state, or with an overlapping multicounty or interstate planning or development agency, state agency, or federal agency, as are appropriate to the achievement of its objectives or to address a common issue. However, the commission may not delegate any of its powers or duties.

(h) The commission may appoint advisory committees to assist in the achievement of its objectives. Members of advisory committees are not entitled to compensation for their services but may be reimbursed for expenses incurred in the performance of their duties.

(i) The commission shall act as the designated review agency and as the clearinghouse as described in federal Office of Management and Budget Circular A-95.

(j) The commission may provide administrative, management, or technical services to a unit that requests the services. The unit and the commission may enter into a contract concerning the

commission's provision of administrative, management, or technical services and the cost to the unit for the services.
As added by Acts 1981, P.L.309, SEC.26. Amended by P.L.145-1992, SEC.1.

IC 36-7-7-8

Agreements with other states

Sec. 8. Counties in the region may enter into agreements with other states, but these agreements do not affect other counties, subregions, or the region. One subregion may also contract with other subregions for services or programs.
As added by Acts 1981, P.L.309, SEC.26.

IC 36-7-7-9

Objections to program; petition

Sec. 9. Whenever the commission receives a petition signed by a majority of the commission members representing a county affected by a particular program, objecting to the establishment of the program within that county, the commission may not implement the program in that county.
As added by Acts 1981, P.L.309, SEC.26.

IC 36-7-7-10

Subregional committees

Sec. 10. (a) A commission may organize into not more than two (2) subregions and provide for the organization of two (2) subregional planning committees, and for meetings and rules of procedure of those committees. These rules of procedure shall be adopted as a part of the rules and bylaws of the commission.

(b) The actions of each subregional committee shall be referred to the other for review. The executive director and staff of the commission shall serve both subregional committees. Each subregional committee shall consider problems that do not directly affect the other subregion. Each subregional committee may hold meetings and elect a chairman and secretary from among its own members.
As added by Acts 1981, P.L.309, SEC.26.

IC 36-7-7-11

Executive director; powers and duties

Sec. 11. (a) The commission shall appoint an executive director who shall serve at the pleasure of the commission as reviewed and recommended by the executive board. The executive director must be qualified by training and

experience in the management of public agencies and knowledgeable in planning.

(b) The executive director is the chief administrative officer and regular technical advisor of the commission. Subject to supervision by the commission, the executive director:

- (1) shall execute the commission functions;
- (2) shall appoint and remove the staff of the commission;

(3) shall submit to the commission annually, or more often if required, a status report on the operation of the agency;

(4) may, with the approval of the executive board, execute contracts, leases, or agreements on behalf of the commission with other persons;

(5) is entitled, upon his written request, to be given access by all governmental agencies to all studies, reports, surveys, records, and other information and material in their possession that are required by him for the accomplishment of the activities and objectives of the commission;

(6) shall propose annually a budget for the operation of the commission and administer the budget as approved by the commission;

(7) shall keep the records and care for and preserve all papers and documents of the commission; and

(8) shall perform other duties and may exercise other powers that the commission or the executive board delegates to him.

As added by Acts 1981, P.L.309, SEC.26.

IC 36-7-7-12

Annual appropriation budget; tax levy; use of funds

Sec. 12. (a) The commission shall prepare and adopt an annual appropriation budget for its operation, which shall be apportioned to each participating county on a pro rata per capita basis. After adoption, any amount that does not exceed an amount for each participating county equal to thirty cents (\$0.30) per capita shall be certified to the respective county auditor who shall advertise the amount and establish the rate in the same manner as other county budgets. Any amount of the adopted budget that exceeds an amount equal to thirty cents (\$0.30) per capita for each participating county is subject to review by the county fiscal body in the usual manner of budget review. The tax so levied and certified shall be estimated and entered upon the tax duplicates by the county auditor and shall be collected and enforced by the county treasurer in the same manner as other county taxes are estimated, entered, collected, and enforced. The tax, as collected by the county treasurer, shall be transferred to the commission.

(b) In fixing and determining the amount of the necessary levy for the purpose provided in this section, the commission shall take into consideration the amount of revenue, if any, to be derived from the federal grants, contractual services, and miscellaneous revenues above the amount of those revenues considered necessary to be applied upon or reserved upon the operation, maintenance, and administrative expenses for working capital throughout the year.

(c) After approval no sums may be expended except as budgeted unless the commission authorizes their expenditure. Before the expenditure of sums appropriated as provided in this section, a claim must be filed and processed as other claims for allowance or disallowance, for payment as provided by law.

(d) Any two (2) of the following officers may allow claims:

- (1) Chairman.
- (2) Vice chairman.
- (3) Secretary.
- (4) Treasurer.

The treasurer of the commission may receive, disburse, and otherwise handle funds of the commission subject to applicable statutes and procedures established by the commission.

(e) The commission shall act as a board of finance under the statutes relating to the deposit of public funds by political subdivisions.

(f) Any appropriated money remaining unexpended or unencumbered at the end of the year becomes part of a nonreverting cumulative fund to be held in the name of the commission. Unbudgeted expenditures from this fund may be authorized by vote of the commission and upon other approval as required by statute. The commission is responsible for the safekeeping and deposit of such sums, and the state board of accounts shall prescribe the methods

and forms for keeping the accounts, records, and books to be used by the commission. The books, records, and accounts of the commission shall be periodically audited by the state board of accounts, and these audits shall be paid for as provided by statute.

As added by Acts 1981, P.L.309, SEC.26. Amended by P.L.144-1992, SEC.4; P.L.165-2003, SEC.5.

IC 36-7-7-13

Economic development districts; definition; payments by counties; use of funds

Sec. 13. (a) An economic development district is a group of adjacent counties that:

(1) contains at least two (2) redevelopment counties;

(2) includes an economic development growth center; and

(3) has been officially designated as an economic development district by the federal government under Title 42, U.S.C. section 3171, on the recommendation of the state.

(b) Counties may make payments to officially designated economic development districts. The board of directors of the economic development district shall determine the amount of the payments, which may be based on the assessed valuation or the population of each county, and the method of making the payments, subject to appropriations by the fiscal bodies of the counties comprising the economic development district.

(c) The economic development district may receive and expend all sums appropriated or granted to it for purposes and activities authorized by law, and shall deposit these sums in its own name and follow all accounting, bonding, and auditing procedures required by law.

(d) The economic development district is responsible for the administration, safekeeping, and deposit of any monies appropriated or granted to it, and may delegate all or part of that responsibility to a designated financial officer.

(e) The economic development district may receive grants from federal, state, or local governments for the purpose of carrying out any of the planning and development activities of the district.

(f) Any sums appropriated to an economic development district that remain uncommitted at the end of the budget year revert on a pro rata basis to the general funds of the counties comprising the district.

As added by Acts 1981, P.L.309, SEC.26.



January 15, 2014

Mr. Edwin Buswell, AICP
Executive Director
Kankakee Iroquois Regional Planning Commission (KIRPC)
PO Box 127
Monon, IN 47959

Re: FY2014 U.S.EPA Brownfields Assessment Grant Coalition

Dear Mr. Buswell:

The City of Delphi acknowledges membership in the coalition; comprised of KIRPC, City of Delphi and City of Knox (the Coalition), constituted for the purpose of applying for a U.S. Environmental Protection Agency Brownfields Assessment Grant to help foster badly needed brownfields redevelopment in the Coalition's 38 micro communities. Delphi is a General Purpose Unit of Local Government in the State of Indiana. The City of Delphi understands the Coalition is applying for a \$400,000 U.S. EPA Brownfields Hazardous Substances Assessment Grant and a \$200,000 U.S. EPA Brownfields Petroleum Assessment Grant, and KIRPC will serve as the lead coalition member and grant recipient/administrator. Upon award of the grant, the City understands the Coalition members will be required to develop a binding Memorandum of Agreement to document the site selection process, allocation of funds, and programmatic mechanisms for implementing the grant project.

The City of Delphi fully supports the Coalition, and looks forward to using the grant funds to revitalize brownfields for mutual benefit of the Coalition communities

Sincerely,

Randy J Strasser, Mayor
City of Delphi

CITY OF KNOX

101 W. Washington Street, Knox, Indiana 46534

Mayor Rick Chambers

CLERK-TREASURER
Jeffery Houston

CITY COUNCIL
Jeff Berg
Linda Berndt
Ron Parker
Greg Matt
Donald Kring

January 15, 2014

Mr. Edwin Buswell, AICP
Executive Director
Kankakee Iroquois Regional Planning Commission (KIRPC)
PO Box 127
Monon, IN 47959

Re: FY2014 U.S.EPA Brownfields Assessment Grant Coalition

Dear Mr. Buswell:

The City of Knox acknowledges membership in the coalition; comprised of KIRPC, City of Delphi and City of Knox (the Coalition), constituted for the purpose of applying for a U.S. Environmental Protection Agency Brownfields Assessment Grant to help foster badly needed brownfields redevelopment in the Coalition's 38 micro communities. Knox is a General Purpose Unit of Local Government in the State of Indiana. The City of Knox understands the Coalition is applying for a \$400,000 U.S. EPA Brownfields Hazardous Substances Assessment Grant and a \$200,000 U.S. EPA Brownfields Petroleum Assessment Grant, and KIRPC will serve as the lead coalition member and grant recipient/administrator. Upon award of the grant, the City understands the Coalition members will be required to develop a binding Memorandum of Agreement to document the site selection process, allocation of funds, and programmatic mechanisms for implementing the grant project.

The City of Knox fully supports the Coalition, and looks forward to using the grant funds to revitalize brownfields for mutual benefit of the Coalition communities.

Sincerely,



ATTACHMENT B
LETTER FROM STATE AUTHORITY





INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

January 22, 2014

Mr. Edwin Buswell
Executive Director
Kankakee-Iroquois Regional Planning Commission (KIRPC)
115 East 4th Street, P.O. Box 17
Monon, Indiana 47959

Re: U.S. EPA Brownfields Grant Proposal
Acknowledgement Letter
Coalition Assessment
Hazardous Substances and Petroleum
Kankakee-Iroquois Regional Planning
Commission (KIRPC) Coalition
Indiana

Dear Mr. Buswell:

This letter is provided in support of the Kankakee-Iroquois Regional Planning Commission (KIRPC) Coalition consisting of the Counties of Benton, Carroll, Jasper, Newton, Pulaski, Starke, Warren, and White (Coalition) proposal to the U.S. Environmental Protection Agency (U.S. EPA) for Brownfields Assessment Grant funding. The Indiana Department of Environmental Management (IDEM) acknowledges that KIRPC is requesting \$600,000 (\$400,000 for hazardous substances and \$200,000 for petroleum) to perform Phase I and Phase II Environmental Site Assessments (ESAs) of priority brownfield sites, and, as applicable, cleanup and redevelopment planning activities (e.g., Remediation Work Plans) for these priority brownfields. IDEM understands that the Coalition also plans to conduct community outreach activities (i.e., coordinating and conducting meetings with stakeholders and the general public) to inform the Coalition residents of the availability of the grant funds as well as the progress of the grant-funded projects.

IDEM believes that the Coalition has demonstrated its commitment to redeveloping brownfields by its members taking advantage of financial and technical assistance offered by U.S. EPA and the Indiana Brownfields Program in the past. This Assessment grant funding will help the Coalition continue its efforts to address brownfields within the Coalition member communities. Should an opportunity arise for the Coalition to need/pursue liability clarification or cleanup at any of the sites investigated with this grant funding, IDEM realizes that the Coalition will work with the Indiana Brownfields Program and/or the IDEM Voluntary Remediation Program.

U.S. EPA Brownfields Grant Proposal 2014
Acknowledgment Letter
Page 2

Based on the information submitted, IDEM considers the Coalition an excellent candidate to receive U.S. EPA grant funding to continue its brownfield redevelopment efforts, which support Indiana's brownfield initiative. IDEM looks forward to continuing its partnership with the Coalition. For further assistance, please contact Michele Oertel of the Indiana Brownfields Program toll free at (800) 451-6027, ext. 4-0235, or directly at (317) 234-0235 or at moertel@ifa.in.gov.

Sincerely,



Bruce A. Oertel, Chief
Remediation Services Branch
Office of Land Quality

BAO/mmo

cc: *(via electronic transmission)*
Linda Mangrum, U.S. EPA Region 5
Kelley Moore, U.S. EPA Region 5
Debbie Sherwood, SME

ATTACHMENT C
COMMITMENT LETTERS FOR LEVERAGING





K-IRPC *Kankakee-Iroquois Regional Planning Commission*

115 East Fourth Street, P.O. Box 127, Monon, Indiana 47959-0127

Telephone: 219.253.6658
Facsimile: 219.253.6659
www.kirpc.net

- * *Economic/Community Development*
- * *Arrowhead Country Public Transit*
- * *K-IRPC Head Start Program*
- * *Rural Transportation Planning*

January 17, 2014

Mr. Edwin Buswell, AICP
Executive Director
Kankakee Iroquois Regional Planning Commission
PO Box 127
Monon, IN 47959

RE: Leveraged Funding from Staff Resources
FY2014 U.S.EPA Brownfields Assessment Grants
KIRPC Coalition, Indiana

Dear Mr. Buswell:

The Kankakee Iroquois Regional Planning Commission (KIRPC) is providing this letter as documentation of our commitment to provide in-kind local government staff resources to support implementation of two FY2014 U.S. EPA Brownfields Assessment Grants (\$400,000 for Hazardous Substances and \$200,000 for Petroleum Substances). Specifically, KIRPC will provide up to 700 hours of staff time (includes grant project manager and staff) to support programmatic, community outreach functions and site selection associated with the Assessment Grant Project. These services include preparation of quarterly reports, progress meetings, financial tracking, preparation and distribution of Project information, hosting public meetings, and coordination with U.S. EPA personnel. The value of these in-kind services is approximately \$35,000 (700 hours at an average hourly rate of \$50).

Very truly yours,

Larry Wilcy, Chairperson
Kankakee Iroquois Regional Planning Commission

ATTACHMENT D

LETTERS FROM COMMUNITY-BASED ORGANIZATIONS



PURDUE

U N I V E R S I T Y

PURDUE UNIVERSITY COOPERATIVE EXTENSION SERVICE
Benton County

January 15, 2014

Mr. Edwin Buswell, AICP
Executive Director
Kankakee Iroquois Regional Planning Commission
PO Box 127
Monon, IN 47959

RE: Community Support for U.S. EPA Brownfields Assessment Grants
KIRPC Coalition, Indiana

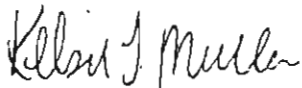
Dear Mr. Buswell:

The Purdue University Cooperative Extension Service (PUCES) is pleased to support your application for two FY2014 U.S. Environmental Protection Agency (U.S. EPA) Brownfields Assessment Grants to assess and promote redevelopment of brownfield sites located in the KIRPC Region.

PUCES would be pleased to offer our facility for your use in conducting community outreach meetings. We recently moved into a new facility that can accommodate up to 75 people. As County Extension Director, I am all too aware of the issues and threats brownfields represents to our citizens, ecosystems and groundwater supply. Our region relies heavily on our agricultural business and a safe groundwater supply is crucial to economic well-being. PUCES would be happy to also assist KIRPC in public outreach on the grant project.

PUCES fully supports the KIRPC Coalitions efforts and we are excited to be part of your team!

Sincerely,



Kelsie Muller
County Extension Director
Purdue Extension Benton County

January 15, 2014

Mr. Edwin Buswell, AICP
Executive Director
Kankakee Iroquois Regional Planning Commission
PO Box 127
Monon, IN 47959

RE: Community Support for U.S. EPA Brownfields Assessment Grants
KIRPC Coalition, Indiana

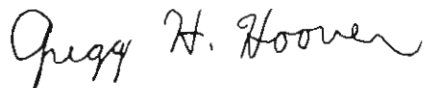
Dear Mr. Buswell:

Benton Central Jr.-Sr. High School is pleased to support your application for two FY2014 U.S. Environmental Protection Agency (U.S. EPA) Brownfields Assessment Grants to assess and promote redevelopment of brownfield sites located in the KIRPC Region. We are excited the grant will assist new development in the Town of Boswell.

If awarded, Ms. Kelly Kepner, Benton County Economic Development Director and I have agreed to develop and incorporate a classroom exercise discussion about Brownfields and economic development into the high school economic curriculum at Benton Central. Further we understand that KIRPC will utilize our lesson plan to present the educational lesson to the other KIRPC school districts. We agree this is a great opportunity to create a positive relationship between the schools and communities while providing an education for our youth! Benton Community Schools will also assist KIRPC with public outreach to notify students and parents of community meetings in our community. Only through education of our citizens and redeveloping brownfields can we start reversing unacceptable exposure risks such as the high blood lead-levels in our children.

Benton Community Schools fully supports the KIRPC Coalition's efforts and we are excited to be part of your team!

Sincerely,

A handwritten signature in cursive script that reads "Gregg H. Hoover".

Gregg H. Hoover
Interim Superintendent
Benton Community School Corporation

STARKE COUNTY ENVIRONMENTAL MANAGEMENT DISTRICT
3835 EAST 250 NORTH STE. B
KNOX, INDIANA 46534

January 15, 2014

Mr. Edwin Buswell, AICP
Executive Director
Kankakee Iroquois Regional Planning Commission
PO Box 127
Monon, IN 47959

RE: Community Support for U.S. EPA Brownfields Assessment Grants
KIRPC Coalition, Indiana

Dear Mr. Buswell:

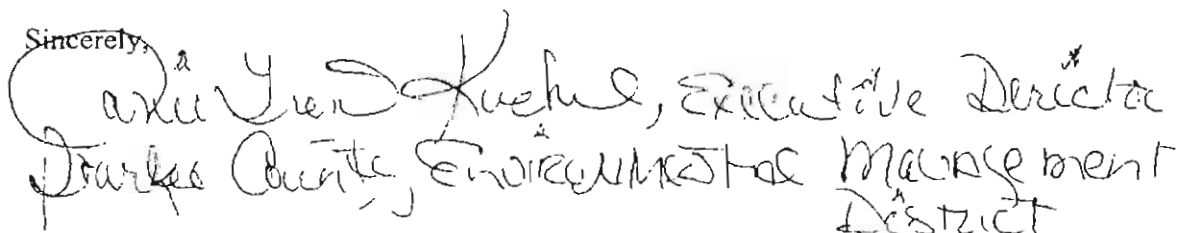
The Starke County Environmental Management District (SCEM) is an "Indiana Solid Waste District". Solid Waste Districts were formed to reduce the volume of waste being discarded into Indiana landfills. Goals of the district are to preserve and enhance our environment, natural resources, and public health and safety, by leading in the proper management of solid waste. We accomplish this through the following:

- Coordinating the implementation of integrated solid waste management systems,
- Recycling, Composting, Pharmaceutical recovery, E-waste recycling, White Good recycling
- Supporting and coordinating all existing municipal and county recycling efforts throughout Starke County
- Educating youth and adults, particularly schoolchildren through environmental education emphasizing the importance of reducing, reusing and recycling to preserve our environment
- Solid Waste Hazardous Waste Management
- Encouraging voluntary participation in recycling, reduction and reuse; encouraging the development of environmentally sound solid waste management programs in business and industry.

SCEM is excited to be a partner in your grant project, and look forward to being a resource to the Coalition on deconstruction techniques in lieu of demolition on brownfield redevelopments and other sustainable waste reduction techniques. We can also serve as a liaison between the Coalition and our counterparts at other KIRPC county environmental management districts and assist with community outreach by linking KIRPC with our existing network.

We also understand the coalition is targeting redevelopment in an area west of Knox and we support redevelopment of this area. Redevelopment of this area will create new job opportunities. SCEM fully supports the KIRPC Coalition's efforts and we are excited to be part of the team!

Sincerely,


Charles A. Quate, Executive Director
Starke County Environmental Management District

Carroll County Wabash & Erie Canal Inc.

1030 West Washington Street

Delphi, Indiana

January 15, 2014

Mr. Edwin Buswell, AICP
Executive Director
Kankakee Iroquois Regional Planning Commission
PO Box 127
Monon, IN 47959

RE: Community Support for U.S. EPA Brownfields Assessment Grants
KIRPC Coalition, Indiana

Dear Mr. Buswell:

The Carroll County Wabash and Erie Canal, Inc. (CCWEC) is pleased to support your application for two FY2014 U.S. Environmental Protection Agency (U.S. EPA) Brownfields Assessment Grants to assess and promote redevelopment of brownfield sites located in the KIRPC Region and City of Delphi.

As you know, the CCWEC is a non-profit organization that for the past 40 years has diligently acquired, restored and developed over 3 miles of the historic Wabash and Erie Canal waterway, developed a 10 mile community trail system and created linear parks and built the nationally acclaimed Wabash and Erie Canal Interpretive Center. It was awarded the *Best New Volunteer Driven Museum in the United States* in 2006 by the American Association of State and Local History (AASLH). We are proud of our preservation efforts that have included numerous canal structures, restoration of three historic bridges and creation of an 1850s Pioneer Village.

Our organization with its droves of volunteers have over the years developed historic realities with creation of linear parks, restoration of structures and leveraging funding. We are also excited that the brownfield grant funds could assist CCWEC achieve our long term goals. The former Peters-Revington brownfield adjoins our Canal Interpretive Center and Canal Park. Despite being an eyesore and potential exposure hazard to our park visitors, our long term plans are to acquire property and expand a museum into a portion of the PR complex, finally be able to pave the main driveway access into our park (PR owns this land but we have been granted passage) and expand both our campsites and staging and restoration areas are being impeded by the site. This grant could be of great assistance to the growth of our organization.

CCWEC would be happy to assist the KIRPC Coalition by utilizing our non-profit community organization to assist you with public outreach and education about brownfields and to assist the Coalition with historic building preservation techniques and provide guidance on trails and linear park construction programs. We understand the Town of Winamac and other communities are interested in trail expansion/volunteer development and our knowledge could be helpful. The CCWEC fully supports the KIRPC Coalitions efforts and we are excited to be part of your team!

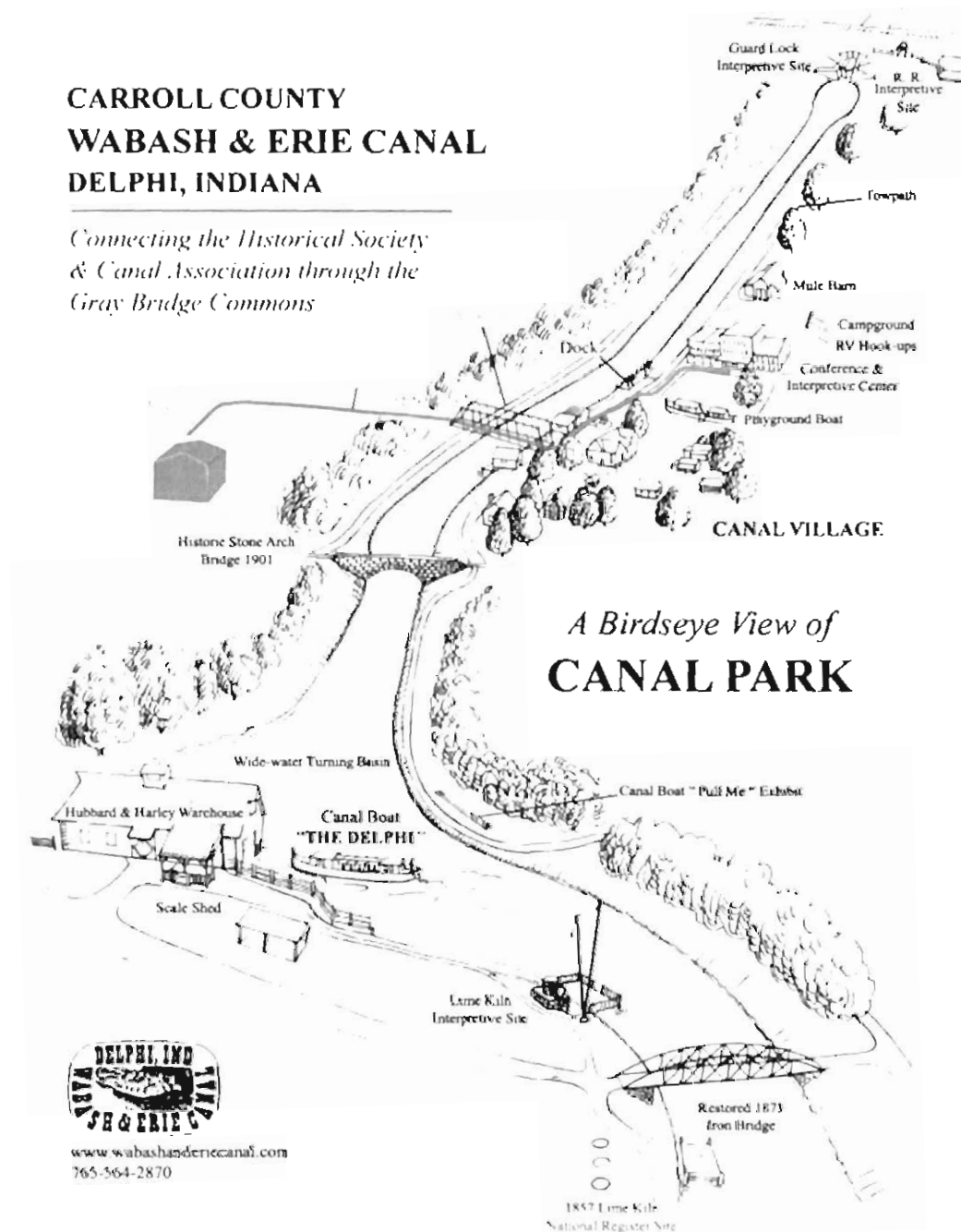
Sincerely,



Dan McCain, CCWEC President

**CARROLL COUNTY
WABASH & ERIE CANAL
DELPHI, INDIANA**

*Connecting the Historical Society
& Canal Association through the
Gray Bridge Commons*



Canal Park with its Pioneer Village and 1850s Commercial/Industrial settlement (foreground).
The Peters Revington site borders us at the upper right.

BENTON COUNTY BOARD OF COMMISSIONERS

Bryan Berry-President

Kevin P. Leuck-Commissioner

Leon R. Cyr- Vice President

January 21, 2014

Mr. Edwin Buswell, AICP
Executive Director
Kankakee Iroquois Regional Planning Commission
PO Box 127
Monon, IN 47959

RE: Benton County Support for U.S. EPA Brownfields Assessment Grants

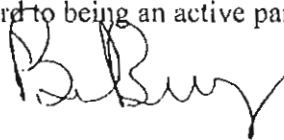
Dear Mr. Buswell:

Benton County would like to express its support for KIRPC's grant applications for two FY2014 U.S. Environmental Protection Agency (U.S. EPA) Brownfields Assessment Grants to assess and promote redevelopment of brownfield sites in the KIRPC Coalition region.

Benton County has several vacant and abandoned former industrial and commercial properties and we are excited this grant will provide funding to begin the process of putting these properties back into use and provide new opportunities for our citizens.

Many of our town's such as Fowler, Otterbein and Boswell have significant challenges with brownfield properties, but could not support a grant program on their own. Benton County is committed to providing support and assistance to KIRPC in this effort and looks forward to being an active partner throughout the grant period.

Sincerely,



President

706 E. 5th Street ♦ Fowler, IN 47944
765-884-1687 ♦ Fax 765-884-2075
auditor@bentoncounty.in.gov



Carroll County
Economic Development Corporation

Producing Tomorrow...Today!

P.O. Box 83, Delphi, IN 46923
765.564.2060 (ph) / 765.564.2207 (fax)
www.carrollcountyedc.com

January 10, 2014

Mr. Edwin Buswell, AICP
Executive Director
Kankakee Iroquois Regional Planning Commission
PO Box 127
Monon, IN 47959

RE: Carroll County Support for U.S. EPA Brownfields Assessment Grants

Dear Mr. Buswell:

Carroll County is pleased to support your application for two FY2014 U.S. Environmental Protection Agency (U.S. EPA) Brownfields Assessment Grants to assess and promote redevelopment of brownfield sites in the KIRPC Coalition region, which includes our county.

Carroll County faces significant challenges as the result of vacant and abandoned former industrial and commercial properties and we are excited this grant will provide funding to begin the process of putting these properties back into use and provide new opportunities for our citizens.

Our small towns and rural communities such as Delphi, Flora and Burlington have challenges similar to larger cities, but could not support a grant program on their own. Carroll County is committed to providing support and assistance to KIRPC in this effort and looks forward to being an active partner throughout the grant period.

Sincerely,

Laura Walls, Executive Director



JASPER COUNTY
ECONOMIC DEVELOPMENT ORGANIZATION

223 W. KELLNER BOULEVARD
RENSSELAER, IN 47978
219.866.3080 - O
219.866.3010 - F
WWW.JASPERCOUNTYIN.COM

January 22, 2014

Mr. Edwin Buswell, AICP
Executive Director
Kankakee Iroquois Regional Planning Commission
PO Box 127
Monon, IN 47959

RE: Jasper County Economic Development Organization Support for U.S. EPA
Brownfields Assessment Grants

Dear Mr. Buswell:

On behalf of the Jasper County Economic Development Organization (JCEDO), I am pleased to support your application for two FY2014 U.S. Environmental Protection Agency (U.S. EPA) Brownfields Assessment Grants to assess and promote redevelopment of brownfield sites in the KIRPC Coalition region, which includes our county.

Jasper County faces challenges as the result of vacant and abandoned properties and we are excited this grant will provide funding to begin the process of putting these properties back into use and provide new opportunities for our citizens.

Our small towns and rural communities such as DeMotte, Remington, Rensselaer and Wheatfield have challenges similar to larger cities, but could not support a grant program on their own. JCEDO is committed to providing support and assistance to KIRPC in this effort and looks forward to being an active partner throughout the grant period.

Sincerely,

Kevin B. Kelly
President

Cultivating Opportunity

January 13, 2014

Mr. Edwin Buswell, AICP
Executive Director
Kankakee Iroquois Regional Planning Commission
PO Box 127
Monon, IN 47959

RE: Newton County Support for U.S. EPA Brownfields Assessment Grants

Dear Mr. Buswell:

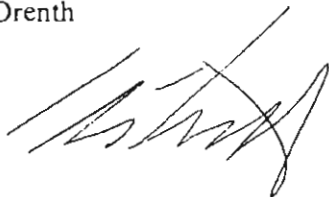
Newton County is pleased to support your application for two FY2014 U.S. Environmental Protection Agency (U.S. EPA) Brownfields Assessment Grants to assess and promote redevelopment of brownfield sites in the KIRPC Coalition region, which includes our county.

Newton County faces significant challenges as the result of vacant and abandoned former industrial and commercial properties and we are excited this grant will provide funding to begin the process of putting these properties back into use and provide new opportunities for our citizens.

Our communities such as Kentland, Morocco and Goodland have challenges similar to larger cities, but could not support a grant program on their own. Newton County is committed to supporting KIRPC in this effort and looks forward to being an active partner throughout the grant period.

Sincerely,

Timothy Drenth
President

A handwritten signature in black ink, appearing to read 'Timothy Drenth', is written over the printed name and title.

PULASKI COUNTY

Indiana

112 E Main St.
Winamac, IN 46996

January 14, 2014

Mr. Edwin Buswell, AICP
Executive Director
Kankakee Iroquois Regional Planning Commission
PO Box 127
Monon, IN 47959

RE: Pulaski County Support for U.S. EPA Brownfields Assessment Grants

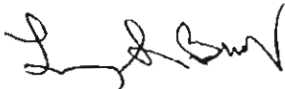
Dear Mr. Buswell:

Pulaski County supports the efforts of the Kankakee Iroquois Regional Planning Commission to secure two FY2014 U.S. Environmental Protection Agency (U.S. EPA) Brownfields Assessment Grants to assess and promote redevelopment of brownfield sites within the region.

Pulaski County has seen successful Brownfield cleanup project within our communities and are excited at the opportunity to have additional work completed in this area. We believe the further assessment of Brownfield properties will benefit our communities and citizens.

Pulaski County is committed to supporting KIRPC in this effort and looks forward to being an active partner throughout the grant period.

Sincerely,



Larry Brady
President

**STARKE COUNTY
BOARD OF COUNTY COMMISSIONERS**

**53 EAST MOUND STREET
KNOX, IN 46534
574-772-9106**

**Jennifer Davis, President
Kent Danford
Kathryn Norem**

**Martin Lucas, County Attorney
Katherine Chaffins, Secretary
& Starke County Auditor**

January 20, 2014

Mr. Edwin Buswell, AICP
Executive Director
Kankakee Iroquois Regional Planning Commission
PO Box 127
Monon, IN 47959

RE: Starke County Support for U.S. EPA Brownfields Assessment Grants

Dear Mr. Buswell:

The Board of Commissioners for Starke County is in support of the Kankakee Iroquois Regional Planning Commission's application for the U.S. U.S. Environmental Protection Agency (U.S. EPA) Brownfields Assessment Grant to assess and promote redevelopment of brownfield sites within the region.

Vacant and abandoned former industrial and commercial properties pose a significant challenge to our communities and hamper community and economic development efforts. We are excited this grant will provide funding to begin the process of putting these properties back into use and provide new opportunities for our citizens. Starke County is committed to providing support and assistance to KIRPC in this effort and looks forward to being an active partner throughout the grant period.

The Starke County Board of Commissioners approved this letter at their Board meeting, on Monday, January 20th.

Sincerely,



Katherine Chaffins,
Auditor of Starke County
Clerk of the Starke County Board of Commissioners

**Office of the Commissioners
Warren County Indiana
125 N Monroe St. Williamsport, IN
47993**

765-762-3275 auditor@warrencounty.in.gov

January 20, 2014

Mr. Edwin Buswell, AICP
Executive Director
Kankakee Iroquois Regional Planning Commission
PO Box 127
Monon, IN 47959

RE: Warren County Support for U.S. EPA Brownfields Assessment Grants

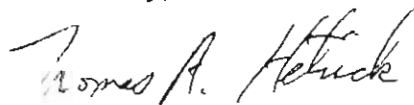
Dear Mr. Buswell:

Warren County is pleased to support the KIRPC application for two FY2014 U.S. Environmental Protection Agency (U.S. EPA) Brownfields Assessment Grants to assess and promote redevelopment of brownfield sites in the KIRPC Coalition region, which includes our county.

Warren County faces significant challenges as the result of vacant and abandoned former industrial and commercial properties and we are excited this grant will provide funding to begin the process of putting these properties back into use and provide new opportunities for our citizens.

Our communities such as Williamsport, West Lebanon, and Pine Village have challenges similar to larger cities, but could not support a grant program on their own. Warren County is committed to supporting KIRPC in this effort and looks forward to being an active partner throughout the grant period.

Sincerely,



President, Warren County
Commissioners

John C. Heimlich, President
Steve Burton, Vice President
David Diener, Member

WHITE COUNTY BOARD OF COMMISSIONERS

PO Box 260
110 N. Main St.
Monticello, IN 47960
Phone 574.583.4879
Fax 574.583.2024

January 14, 2014

Mr. Edwin Buswell, AICP
Executive Director
Kankakee Iroquois Regional Planning Commission
PO Box 127
Monon, IN 47959

RE: White County Support for U.S. EPA Brownfields Assessment Grants

Dear Mr. Buswell:

White County would like to express its support for the KIRPC application for two FY2014 U.S. Environmental Protection Agency (U.S. EPA) Brownfields Assessment Grants to assess and promote redevelopment of brownfield sites in the KIRPC Coalition region.

Our county faces significant challenges as the result of vacant and abandoned former industrial and commercial properties, and we are excited this grant will provide funding to begin the process of putting these properties back into use and provide new opportunities for our citizens.

Many of our communities have challenges similar to larger cities, but could not support a grant program on their own. White County is committed to supporting KIRPC in this effort and looks forward to being an active partner throughout the grant period.

Sincerely,



John Heimlich, President
White County Commissioner

Appendix 3 Other Factors Checklist

Kankakee-Iroquois Regional Planning Commission (KIRPC) Coalition, Indiana

Name of Applicant: (City of Delphi and City of Knox)

Please identify (with an **X**) which, if any of the below items apply to your community or your project as described in your proposal. To be considered for an Other Factor, you must include the page number where each applicable factor is discussed in your proposal. EPA will verify these disclosures prior to selection and may consider this information during the selection process. If this information is not clearly discussed in your narrative proposal or in any other attachments, it will not be considered during the selection process.

	Other Factor	Page #
X	Community population is 10,000 or less	1*
	Federally recognized Indian tribe	
	United States territory	
	Applicant will assist a Tribe or territory	
	Targeted brownfield sites are impacted by mine-scarred land	
	Targeted brownfield sites are contaminated with controlled substances	
	Recent natural disaster(s) (2006 or later) occurred within community, causing significant community economic and environmental distress	
X	Project is primarily focusing on Phase II assessments.	8-9
X	Applicant demonstrates firm leveraging commitments for facilitating brownfield project completion by identifying amounts and contributors of funding in the proposal and have included documentation	9
X	Community experienced manufacturing plant closure(s) (2008 or later) tied to the targeted brownfield sites or project area, including communities experiencing auto plant closures due to bankruptcy or economic disruptions.	6
	Recent (2008 or later) significant economic disruption (<u>unrelated</u> to a natural disaster or manufacturing/auto plant closure) has occurred within community, resulting in a significant percentage loss of community jobs and tax base.	
	Applicant is a recipient or a core partner of a HUD-DOT-EPA Partnership for Sustainable Communities (PSC) grant that is directly tied to the project area, and can demonstrate that funding from a PSC grant has or will benefit the project area. To be considered, applicant must attach documentation which demonstrates this connection to a HUD-DOT-EPA PSC grant.	
	Applicant is a recipient of an EPA Brownfields Area-Wide Planning grant	
	Community is implementing green remediation plans.	
	Climate Change	

*Please note KIRPC covers 8 counties, with 38 micro communities. No city or town in KIRPC exceeds 6,000 in population and 2 of the 8 counties have population under 10,000.